A.2.3

George
Please follow up with Hydrite Chem
Thanks, Joe

HYDRITE CHEMICAL CO.

300 N. PATRICK BLVD. (53045-5816)
P.O. BOX 0948
BROOKFIELD, WI 53008-0948
OFFICE: 262/792-1450
FACSIMILE: 262/792-8721

October 22, 2007

Mr. Jose G. Cisneros, Chief
Waste Management Branch
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Attention: DE-9J

Re: 2020 Corrective Action Universe, Hydrite Chemical Co. facility identification numbers WID006435895 and WID006435887

Dear Mr. Cisneros:

Hydrite Chemical Co. has received your letters regarding the inclusion of the sites located at 229 E National Ave. and 221 E Oregon St. in the City of Milwaukee, WI to the list of facilities that comprise the 2020 Corrective Action Universe. The purpose of this letter is to inform you that Hydrite Chemical Co. no longer owns either of those properties.

The site located at 229 E National Ave (WID006435895) was sold to Roy Wms., Inc. on May 12, 2000.

The site located at 221 E Oregon St (WID006435887) was sold to Gerald R. Jonas on March 28, 1986.

Please modify the 2020 Corrective Action Universe list, as appropriate.

Thank you for your cooperation. You may contact me at 262-792-8796 at your convenience if you have any questions or require additional information.

Sincerely,

Thomas J. Miazga
Dir Safety, Quality & Regulatory Affairs

C: Mark Gordon - WDNR

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

JUN 29 1982

Charles Clarke, Safety Director
Hydrite Chemical Company
1237 W. Bruce Street
Milwaukee, Wisconsin 53204

RE: Interim Status Acknowledgement USEPA ID No. WI D006435887
FACILITY NAME: Hydrite Chemical Company

Dear Mr. Clarke:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for interim status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for interim status. Our opinion will be reevaluated on the basis of this information.

The State of Wisconsin has received Phase I interim authorization under Section 3006 of RCRA. Because of this authorization you are required to comply with standards prescribed in the Wisconsin Administrative Code, NR-181, in lieu of the standards in 40 CFR 265. In addition, you are reminded that operating under interim status does not relieve you of the need to comply with other applicable Federal, State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from the Part A permit application that was sent to USEPA. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR 122.23 and as State regulations allow.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR 122.23; your facility may operate under interim status until such time as an RCRA permit is issued or denied. This will be preceded by a request from this office or the Wisconsin Department of Natural Resources for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch Jr

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

JES
6/29/82

Enclosure

cc: M. R. Honkamp, Vice President, Operations

FACILITY NAME	EPA ID NUMBER
HYDRITE CHEMICAL COMPANY	WID006435887

FACILITY OPERATOR

HYDRITE CHEMICAL COMPANY

FACILITY OWNER

HYDRITE CHEMICAL COMPANY

FACILITY LOCATION

221 EAST OREGON STREET
MILWAUKEE WI 53204

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	46000.00000	G
T01	6500.00000	U
T03	5400.00000	E

OD 4ES 6/29/82

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

A

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ WID006435887 REACKNOWLEDGEMENT

HYDRITE CHEMICAL CO
1237 WEST BRUCE STREET
MILWAUKEE WI 53204

INSTALLATION ADDRESS ➤ 221 EAST OREGON STREET
MILWAUKEE WI 53204

EPA Form 8700-12B (4-80)

08/13/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

I. INSTALLATION'S EPA I.D. NO.: WID006435887

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS: HYDRITE CHEMICAL CO*
1237 W BRUCE ST
MILWAUKEE, WI 53204

000062 AUG 20 80

III. LOCATION OF INSTALLATION: 221 East Oregon
MILWAUKEE, WI 53204

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F WI D006435887 T/A 2 C 1	A	800818

I. NAME OF INSTALLATION

HYDRITE CHEMICAL CO

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: ~~2655~~ 1237 N MAYFAIR ROAD WEST BRUCE STREET

CITY OR TOWN: MILWAUKEE | ST.: WI | ZIP CODE: 53204-26

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 221 EAST OREGON STREET

CITY OR TOWN: MILWAUKEE | ST.: WI | ZIP CODE: 53204

257-2300

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: CLARKE CHARLES SAFETY DIRECTOR

PHONE NO. *(area code & no.)*: 414-357-3388

DETACH

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: HYDRITE CHEMICAL CO

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [X] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: WIDOO643588 7

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 18 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	W	1	D	0	0	6	4	3	5	8	8	7	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 2	F 0 0 3	F 0 0 5	F 0 0 7	
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
D 0 0 G					
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	Charles S. Clarke Safety Director	8/15/80

EPA Form 8700-12 (6-80) REVERSE

DETACH

DETACH

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

149

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F W I D 0 0 6 4 3 5 8 8 7 3

LABEL ITEMS

- EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill–in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill–in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold–faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP HYDRITE CHEMICAL CO.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 CLARKE CHARLES SAFETY DIRECTOR	414 384 3680

V. FACILITY MAILING ADDRESS

414-257-2300

A. STREET OR P.O. BOX

3 1237 W. BRUCE STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 MILWAUKEE	WI	53204

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 221 EAST OREGON STREET

B. COUNTY NAME

MILWAUKEE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 MILWAUKEE	WI	53204	079

NOV 19 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2874 (specify) Chemical Manufacturing	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: HYDRITE CHEMICAL CO.

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 414 384 3680

E. STREET OR P.O. BOX: 1237 WEST BRUCE STREET

F. CITY OR TOWN: MILWAUKEE

G. STATE: WI

H. ZIP CODE: 53204

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N	P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
U	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
R	9 (specify) → F9A/50

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. → F9A/51

XII. NATURE OF BUSINESS (provide a brief description)

Repackaging, Compounding, and Distribution of Alkaline, Mineral Acids, Inorganic Salts, Chlorinated and Nonchlorinated Solvent Repackagers of Chlorine.

Manufacturing of Phosphoric Acid and Sodium Hypochlorite.
Reclamation of Chlorinated and Nonchlorinated Solvents.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
M. R. Honkamp Vice President, Operations	M. R. Honkamp	11/18/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

149

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F W 1 D 0 0 6 4 3 5 8 8 7 3 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
64	01	

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 3 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	KH	5	S01	46000000	G	
X-2	T03	20	E	KH	6				
1	S01	6,000000	G	KH	7				
2	S01	40,000000	G	KH	8				
3	T01	67,100000 6500	G		9				
4	T03	5,400000	E		10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY														
S	W	W	1	D	0	0	6	4	3	5	8	8	7	T/A 3	C 1	S	W	DUP	T/A 3	C 2	DUP
1	2												13	14	15	1	2		13	14	15	23 - 26

II. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	
001	F 0 0 1	48,000 000	P	S 0 1	
002	F 0 0 2	~~999999999KH~~			Included Above
003	F 0 0 3	~~3.2 x 10^7~~ 32000000000 KH	P	S 0 1 T 0 3	
004	F 0 0 5				Included Above
5	D 0 0 2	400 000	T	S 0 1 T 0 1	
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26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WAS (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F | W I D 0 0 6 4 3 5 8 8 7 | 3 | 6

F6A/55

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6N/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
43 01 48 N	087 54 30 W

VIII. FACILITY OWNER

XX A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E | Hydrite Chemical Co.	414 - 384 - 3680

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F | 1237 West Bruce Street	G | Milwaukee	WI	53204

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
M. R. Honkamp Vice President, Operations	M. R. Honkamp	11/18/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

AUG 5 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5HW-TUB

Mr. Charles Clarke
Safety Director
Hydrite Chemical Co.
221 East Oregon Street
Milwaukee, Wisconsin 53204

RE: EPA ID No. # WID006435887

Dear Mr. Clarke:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute a Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than ~~January 14~~ February 16, 1983. CJK corrected, 1983. Please uniquely number each page of the application including all attachments (maps, specifications, etc.) A certification statement identical to the one stated in 40 CFR 122.6(d) must accompany the application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Y. J. Kim of my staff at (312) 353-1428, as you begin preparing your application. Y. J. Kim will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

AUG 5 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5HW-TUB

Mr. Charles Clarke
Safety Director
Hydrite Chemical Co.
221 East Oregon Street
Milwaukee, Wisconsin 53204

RE: EPA ID No. # WID006435887

Dear Mr. Clarke:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute a Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than January 14, 1983. Please uniquely number each page of the application including all attachments (maps, specifications, etc.) A certification statement identical to the one stated in 40 CFR 122.6(d) must accompany the application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Y. J. Kim of my staff at (312) 353-1428, as you begin preparing your application. Y. J. Kim will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Failure to furnish your complete Part B application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.22.

Information you submit in the Part B application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (USEPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. USEPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a permit to your facility by USEPA.

We will coordinate review of your application with the Wisconsin Department of Natural Resources, and if your application is acceptable, will strive for the simultaneous issuance of a Federal permit and a State license. If you have questions on the State license procedure they should be directed to Mr. William Rock at (608) 266-0833. It is possible that during the processing of your application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of USEPA will make the final determination on your application.

We look forward to receiving your Part B application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 122.25
40 CFR 264

cc: M. R. Honkamp, Vice President, Operations
Hydrite Chemical Co.

William Rock, WDNR

bcc: Y. J. Kim
Part A file

	TYPIST	AUTHOR			TPS		AUMD DIRECTOR
INITIALS		R.K.		Banaszak			
DATE	7/28/82	7/28/82		7/30/82		7/30	

AUG 5 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5HW-TUB

Mr. Charles Clarke
Safety Director
Hydrite Chemical Co.
221 East Oregon Street
Milwaukee, Wisconsin 53204

RE: EPA ID No. # WID006435087

Dear Mr. Clarke:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute a Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than ~~January 14~~ February 16, 1983. corrected, 1983, Your application including all attachments (maps, specifications, etc.) A certification statement identical to the one stated in 40 CFR 122.6(d) must accompany the application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Y. J. Kim of my staff at (312) 353-1428, as you begin preparing your application. Y. J. Kim will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

AUG 5 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles Clarke
Safety Director
Hydrite Chemical Co.
221 East Oregon Street
Milwaukee, Wisconsin 53204

RE: EPA ID No. # WID006435887

Dear Mr. Clarke:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute a Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than January 14, 1983. Please uniquely number each page of the application including all attachments (maps, specifications, etc.) A certification statement identical to the one stated in 40 CFR 122.6(d) must accompany the application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Y. J. Kim of my staff at (312) 353-1428, as you begin preparing your application. Y. J. Kim will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Failure to furnish your complete Part B application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.22.

Information you submit in the Part B application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (USEPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. USEPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a permit to your facility by USEPA.

We will coordinate review of your application with the Wisconsin Department of Natural Resources, and if your application is acceptable, will strive for the simultaneous issuance of a Federal permit and a State license. If you have questions on the State license procedure they should be directed to Mr. William Rock at (608) 266-0333. It is possible that during the processing of your application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of USEPA will make the final determination on your application.

We look forward to receiving your Part B application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 122.25
40 CFR 264

cc: M. R. Monkamp, Vice President, Operations
Hydrite Chemical Co.

William Rock, WDNR

bcc: Y. J. Kim
Part A file

	TYPIST				AUMD DIRECTOR
INITIALS		R. Kay	Bamasek		
DATE		7/28/82	7/30/82	7/30	

Mr. William Rock is the contact for State Program issues. However, as your facility is located in the Southeast District, questions on the requirements for your facility should be directed to Arthur Glor at (414) 257-4413.

WISCONSIN
DEPT. OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Southeast District - Annex building
Post Office Box 12436
4041 N. Richards St.
Milwaukee, Wisconsin 53212
TELEPHONE: 414-961-2727
TELEFAX# : 414-961-2770

December 21, 1992

In Response Refer To: FID# 241020890
County of Milwaukee
HW LIC File/hydtcvr.1292

Tom Miazga, Director of Regulatory & Environmental Affairs
Hydrite Chemical Company
Drawer #0948
Brookfield, Wisconsin 53008-0948

Subject: Hydrite Chemical Company - National Avenue Facility
229 East National Avenue, Milwaukee, WI.
EPA ID# WID006435887
Conditional Closure Plan Approval Modification

Dear Mr. Miazga:

The Department has reviewed the report titled "Amended Closure Plan/Remedial Action Plan - Hydrite Chemical Company - National Avenue Site - Milwaukee, Wisconsin - February 1992", which was received by the Department on February 4, 1992. This report was prepared by RMT, Inc. (RMT) on behalf of Hydrite Chemical Company (Hydrite). The Department has also reviewed additional closure information submitted by Hydrite in letters dated October 25, 1991, January 31, 1992 and June 25, 1992. This conditional closure plan approval modification allows Hydrite to proceed to implement the proposed closure soil investigation and "NR 140 - Soil Characterization" investigation, provided the conditions of the attached closure plan approval modification and applicable administrative codes are complied with. A discussion of the Department's review of the submittals listed above, follows. This discussion also includes the Department's review of Hydrite's September 25, 1992 comment letter submitted in response to the Department's August 31, 1992 draft of this conditional closure plan approval modification.

In the September 25, 1992 comment letter Hydrite requested "..that the conditions applicable to the Hazardous Waste Facility Closure activity be clearly distinguished from those applicable to the NR 140 Soil Characterization [investigation]". The Department intentionally worded several of the conditions to pertain to both the closure and NR 140 soil characterization investigations, because these two soil investigations will occur at the same time. The Department assumed the soil samples would then be analyzed at the same time, resulting in the analytical data being separately summarized and evaluated, but submitted to the Department in one report. Therefore, to address this request the Department reviewed the conditions and categorized them as being applicable to either 1) both the closure and NR 140 soil characterization investigations; 2) the closure investigation only; or 3) the NR 140 soil characterization investigation only. Conditions # 1, 2, 3, 6, 7a, 7b, 8, 9, 10, 11 and 12 are applicable to both the closure and the NR

140 soil characterization investigations. Conditions # 4 and 7c are applicable to the closure investigation only. Finally, conditions #5 and 7d are applicable to the NR 140 soil characterization investigation only.

In association with closure of the hazardous waste management storage areas at the National Avenue facility, Hydrite has proposed to establish clean closure levels for selected constituents of concern in soil. This will be accomplished by first analyzing the selected constituents of concern in soil samples for compositional (total) concentrations, and then performing a statistical evaluation of this analytical data relative to selected background data for the site. The Department is approving the proposed statistics with the understanding (following an 8/17/92 phone conversation with Tom Stolzenburg of RMT), that 1) soil proton concentrations, not pH, will be used in the statistical calculations; and 2) Hydrite will present and justify the numerical values selected for performing the statistical calculations when an individual constituent analysis comes back as less than the detection limit. After receiving the report containing the results of the closure investigation, the Department will need to review the calculated background concentrations and statistics, and make a determination as to whether or not the methods, results and recommendation for either follow-up closure action or no further closure action, are acceptable for approval.

The Department still believes that cyanide may be of concern at the Hydrite National Avenue facility and denies Hydrite's request to delete cyanide from the closure parameter list. Cyanide has been included because F007 waste was listed on Hydrite's hazardous waste notification form for the Hydrite National Avenue facility and Hydrite accepted waste from numerous companies involved in electroplating operations. F007 waste is consistent with expected incoming waste streams. Therefore, the analysis of soil samples for cyanide is necessary to clarify whether cyanide wastes were handled at the facility.

The Department has determined that for <u>selected constituents</u> a leach test may be performed on the soil samples collected as part of the NR 140 soil characterization investigation. The proposed leach test is not acceptable to the Department. Instead, Hydrite may perform the leach test using the EPA proposed SW-846 Method 1312, which uses a mild acid as the leaching medium, rather than distilled water.

The following constituents were detected in one or more monitoring wells at the Hydrite National Avenue facility in concentrations at or above either the Ch. NR 140, Wisconsin Administrative Code, Preventive Action Limit (PAL) or Enforcement Standard (ES): arsenic, benzene, cadmium, chromium, lead, nitrate-nitrite, silver, sulfate and toluene. In addition, RMT (on behalf of Hydrite) reported in the February 1992 amended closure plan/remedial action plan that "...elevated levels of ammonia-nitrogen (22 to 1,100 mg/L) and phosphate (200 to 760 mg/L) were detected in all three monitoring wells, although no standards exist for these parameters." Chloride has also been detected in groundwater samples at potentially elevated concentrations (although the PAL for chloride has not been attained or exceeded), and was proposed as an NR 140 soil characterization parameter by RMT. Nickel was detected in one of the on-site monitoring wells at a concentration of 170 ug/L, which exceeds the proposed Federal Maximum Contaminant Level (MCL) of 100 ug/L. Therefore, except for benzene, toluene and silver, these constituents are included on either the closure parameter list or on the NR 140 soil characterization parameter list. At this time, silver is not a required NR 140 <u>soil</u> characterization parameter. It was detected at the PAL in only one of five groundwater samples taken from the three facility

monitoring wells. However, since silver attained its PAL, it must be included on the parameter list developed for the additional groundwater investigation required by condition #7 of the attached approval to determine if it is present. Benzene and toluene are also not required parameters for this NR 140 soil characterization investigation, because information gathered at the Hydrite facility to-date suggests that these constituents would fall under the authority of the Department's UST program. The Hazardous Waste Management program will recommend to the UST program that benzene and toluene be analyzed for during any future rounds of UST groundwater sampling. The Department suggests, however, that Hydrite consider analyzing the soil samples for constituents that may be of concern with respect to other regulatory programs, such as the UST program (e.g., BTEX and TPH), and any other constituents viewed as a potential concern by Hydrite.

At this time, the Department will not require that soil (fill) samples be analyzed for grain size distribution, and will not require the preparation of expanded geologic cross-sections. The Department, however, reserves the right to require this information at any time in the future, if deemed necessary.

The September 25, 1992 letter from Hydrite states that "Should those indicator parameters be detected at a given source area in sufficient concentration to warrant further evaluation per ch. NR 140, Hydrite intends to continue the evaluation process. If, however, there is not an indication of the presence at a given source area, no further NR 140 evaluation of that area would be conducted." Hydrite should be aware that any decision to terminate the NR 140 Soil Characterization investigation must be approved by the Department.

This approval allows Hydrite to implement a closure investigation and an NR 140 soil characterization investigation under the authorities of Chs. NR 600 - 685 and NR 140, Wis. Adm. Code. It should be noted, however, that contamination at the facility may also need to be addressed under other regulatory programs (e.g., UST). This conditional approval does not cover the UST removal/investigation at the Hydrite National Avenue facility. Verbal approval of the UST plan was previously given by Chip Krohn (SED office). Hydrite should continue to obtain guidance and approval from Chip Krohn on that project.

The burden of proof remains with Hydrite to show that detected constituents of concern in groundwater have not originated from Hydrite's previous operations at the National Avenue facility. In addition, the fact that the site is complicated due to unknown fill, history of property ownership and complex groundwater flow patterns strongly argues for adequate environmental investigations to attempt to determine the source, degree and extent of contamination that has been detected during previous site investigations. The Department recently provided Hydrite with data results from the groundwater monitoring program in-place at the adjacent Florida Yards property. This is an example of another facility in this area where a WDNR environmental investigation is being performed.

Under the authority of Ch. NR 140, Wis. Adm. Code, the Department is requiring Hydrite to submit a proposal for an additional groundwater investigation with the objective of further defining the source, degree and extent of groundwater contamination at the Hydrite National Avenue facility. All constituents detected in groundwater that have attained or exceeded their statutory NR 140, Wis. Adm. Code PAL must be included on a parameter list developed for this additional groundwater investigation (see condition #7 of the attached approval). This parameter list must also include constituents that do not

have PALs, but for which elevated concentrations have been noted.

Wisconsin has obtained final authorization for the RCRA Corrective Action Program from the U.S. EPA and may impose corrective action requirements on regulated facilities. At this time, the Department does not intend to use this authority at the Hydrite facility, provided there is adequate resolution of environmental contamination problems at the facility.

The Department looks forward to continued cooperation with Hydrite on this remediation project. If you have any questions or comments, please feel free to call Patrick Brady of my staff at (414) 961-2717, or Cynde English in Madison at (608) 266-7017.

Sincerely,

Walt Ebersohl

Walter A. Ebersohl
Hazardous Waste Management Section Supervisor
Southeast District

cc: SED Casefile (W. Ebersohl, P. Brady)
Ed Lynch - SW/3
Cynde English - SW/3
Pete Flaherty - LC/5
J. Greene - DOJ
C. Krohn - SED LUST Section
Steve Martin - RMT, Inc.
Chuck Slaustas - U.S. Region V (RCRA Permitting Branch - HRP/8J)

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
CONDITIONAL CLOSURE PLAN APPROVAL MODIFICATION
HYDRITE CHEMICAL COMPANY - NATIONAL AVENUE FACILITY
MILWAUKEE, WISCONSIN
WID#006435887
FID#241020890

FINDINGS OF FACT

GENERAL INFORMATION

OWNER/OPERATOR: Hydrite Chemical Company
300 N. Patrick Blvd. (53045)
Drawer #0948
Brookfield, WI. 53008-0948

CONTACT: Tom Miazga, Dir. of Regulatory & Environmental Affairs
300 N. Patrick Blvd. (53045)
Drawer #0948
Brookfield, WI. 53008-0948
(414) 792-8796

CONSULTANT: RMT, Inc.
744 Heartland Trail
Madison WI 53708-8923
(608) 831-4444
Steve Martin, Hydrogeologist

FACILITY LOCATION: The Hydrite Chemical Company - National Avenue facility is located on the near southeast side of the city of Milwaukee, Wisconsin (NE 1/4, NE 1/4, SE 1/4, Section 32, T7N, R22E, Milwaukee County), approximately 800 feet west of the Milwaukee Harbor. The address for the facility is as follows:

Hydrite Chemical Company
229 East National Avenue
Milwaukee, WI 53204

The Department finds that:

1. Hydrite Chemical Company - National Avenue facility (Hydrite) filed a notification of hazardous waste activity form on November 18, 1980. An EPA RCRA Part A hazardous waste permit application was filed on November 5, 1982 with EPA. An interim license was issued to Hydrite on January 19, 1983 allowing the facility to store waste in above ground tanks on site. A subsequent notification of hazardous waste activity form was filed with the Department on August 11, 1988.

2. On February 18, 1983 Hydrite submitted a Part B hazardous waste permit application to the U.S. EPA. On May 8, 1985 the Department called in Hydrite's feasibility report. On February 11, 1987 a favorable feasibility report determination was issued to Hydrite by the Department. Subsequently, the Department received a plan of operation report for the Hydrite National Avenue facility on May 6, 1987.

3. In a November 15, 1988 letter to the Department, Hydrite announced their intent to close the National Avenue facility. On January 31, 1989 the Department acknowledged Hydrite's intent to close the National Avenue facility.

4. Characteristic hazardous wastes as defined in s. NR 605.08, Wis. Adm. Code and listed hazardous wastes as defined in s. NR 605.09, Wis. Adm. Code have been stored at the Hydrite Chemical Company - National Avenue facility.

5. Materials have been discharged at the Hydrite facility that are hazardous substances as defined in s. 144.01(4m), Wis. Stats., and s. NR 158.03(4), Wis. Adm. Code. Materials may have been discharged at the Hydrite facility that are hazardous wastes as defined in s. 144.61(5), Wis. Stats., and s. NR 605.04, Wis. Adm. Code.

6. The Department and Hydrite have been working to obtain closure of Hydrite's former hazardous waste storage area at the National Avenue facility for over three years. The following chronology of submittals and major issues is presented:

   a. On May 26, 1989 Hydrite submitted a revised closure plan. On August 24, 1989 the Department public noticed Hydrite's intent to close. Subsequently, the closure plan was conditionally approved by the Department in a letter to Hydrite dated October 19, 1989.

   b. On April 27, 1990, the Department issued a notice of violation to Hydrite citing them for noncompliance with their approved closure plan.

   c. On April 17, 1990, Hydrite received their last shipment of hazardous waste from off-site. On June 30, 1990, Hydrite sent their last shipment of hazardous waste off-site.

   d. On May 16, 1990, Hydrite submitted to the Department a revised closure schedule for the National Avenue facility.

   e. In July and August of 1990, subsurface soil sampling and analyses were performed at the Hydrite National Avenue facility in response to closure requirements.

   f. On August 17, 1990, officials from Hydrite, Triad Engineering and the Department met to discuss the results of the July and August

1990 subsurface soil sampling and analyses.

g. In an August 27, 1990, letter to Triad Engineering, the Department requested additional environmental investigations be performed at the Hydrite National Avenue facility to further determine the degree and extent of contamination due to facility operations.

h. On September 14, 1990 Triad Engineering, on behalf of Hydrite, submitted a work plan for additional environmental sampling and analyses at the National Avenue facility.

i. On November 15 and 16, 1990 soil samples and groundwater samples (via newly constructed monitoring wells) were collected from the Hydrite National Avenue facility and analyzed.

j. On February 13, 1991 groundwater samples were again collected from the facility monitoring wells and additional laboratory analyses were performed on the samples.

k. On March 4, 1991 Triad and Giles Engineering (on behalf of Hydrite) submitted an environmental investigation report that included the results of the sampling and analyses performed in November of 1990 and February of 1991.

l. On June 26, 1991 officials from Hydrite, Triad and Giles Engineering and the Department met at Triad Engineering to discuss the results of all environmental sampling and analyses performed to-date.

m. On June 27, 1991 additional groundwater samples were collected for laboratory analyses from the three facility monitoring wells.

n. On July 17, 1991 officials from Hydrite, Triad and Giles Engineering and the Department met in Madison to discuss the status of closure for the Hydrite National Avenue facility.

o. On September 4, 1991 the Department sent a letter to Hydrite requesting that a combined remediation plan and revised closure plan be prepared and submitted.

p. On September 26, 1991 Triad and Giles Engineering, on behalf of Hydrite, submitted a complete set of available environmental monitoring results.

q. On October 25, 1991, Hydrite submitted a letter to the Department that addressed outstanding issues from their previous submittals and requested a 30 day extension for submittal of the combined closure/remediation plan. In an October 30, 1991 letter to Hydrite, the Department granted their extension request. On November 15, 1991 Hydrite's consultant, RMT, requested an

additional 30 day extension. In a January 7, 1992 letter to Hydrite, the Department provided comments on the October 25, 1991 submittal from Hydrite and approved the extension request made by RMT.

r. On January 31, 1992 Hydrite sent a letter to the Department, which addressed item #2 of the Department's January 7, 1992 letter, and stated that items #1 and #3 would be addressed in the revised closure plan/remedial action plan. On February 3, 1992 RMT (on behalf of Hydrite) submitted a work plan to the Department titled "Amended Closure Plan/Remedial Action Plan - Hydrite Chemical Company - National Avenue Site - Milwaukee Wisconsin - February 1992".

s. On May 11, 1992, the Department meet with officials from Hydrite and their consultant, RMT, to discuss the February 3, 1992 revised closure plan submittal. In a June 25, 1992 letter to the Department, RMT responded to the Department's request for information from the May 11, 1992 meeting.

t. On August 31, 1992, the Department issued a draft conditional closure plan approval modification to Hydrite. In a letter dated September 25, 1992, Hydrite provided comments to the Department on draft conditional closure plan approval modification.

7. Ch. NR 140, Wis. Adm. Code, Preventive Action Limits and Enforcement Standards for substances of health and welfare concerns have been attained or exceeded at the point of standards application.

8. In accordance with s. NR 103.08, Wis. Adm. Code, the Department has determined that the activities approved under this conditional closure plan approval will not adversely affect any wetland areas. Therefore, these activities are in conformance with the provisions of ch. NR 103, Wis. Adm. Code.

9. This conditional closure plan approval is necessary to protect human health and the environment. This conditional closure plan approval is also necessary to approve soils investigations to address chs. NR 600 - 685, Wis. Adm. Code, and ch. NR 140, Wis. Adm. Code, as applicable to closure of hazardous waste storage areas and groundwater contamination.

CONCLUSIONS OF LAW

1. The Department has the authority to grant licenses in accordance with s. 144.64(2), Wis. Stats. Hydrite was granted an interim license as a hazardous waste storage facility in accordance with ch. NR 181, Wis. Adm. Code (ch. NR 181, Wis. Adm. Code was the predecessor of chs. NR 600 through 685, Wis. Adm. Code).

2. The Department is required to adopt rules under s. 144.62(8), Wis. Stats. that prescribe requirements for the management of hazardous waste. Chs. NR 600 through 685, Wis. Adm. Code, were promulgated under this authority.

3. Closure requirements for container and tank storage facilities are outlined in ss. NR 640.16 and 645.17, Wis. Adm. Code. These sections require that the owner or operator of a facility remove or decontaminate all waste residues, including contaminated soils.

4. Hazardous substances are defined in s. 144.01(4m), Wis. Stats. Hazardous waste means any solid waste identified by the Department as hazardous under s. 144.62(2), Wis. Stats. Hazardous substances were released into the environment at the Hydrite National Avenue facility. Hazardous wastes may have been released into the environment at the Hydrite National Avenue facility.

5. A person who possesses or controls a hazardous substance that is discharged, or who causes a discharge of a hazardous substance, is required under s. 144.76(3), Wis. Stats. to take actions necessary to restore the environment and minimize the harmful effects of discharges of hazardous substances to the environment.

6. The Department has authority under ss. NR 140.24 and NR 140.26, Wis. Adm. Code, to specify the terms and conditions under which the Department may seek remedial action when a preventative action limit or enforcement standard is attained or exceeded.

7. The Department has the authority to impose monitoring requirements pursuant to s. NR 600.07, Wis. Adm. Code, if the Department determines there is potential for discharges of hazardous waste or hazardous constituents to the environment.

CONDITIONAL APPROVAL

Based on the Finding of Facts and Conclusions of Law, the Department issues this modification to the Hydrite Conditional Closure Plan Approval subject to compliance with chs. NR 600 - 685 and NR 140, Wis. Adm. Code, and the following conditions:

1. All scope of work activities shall be conducted in accordance with the report entitled "Amended Closure Plan/Remedial Action Plan, Hydrite Chemical Company, National Avenue Site, Milwaukee, Wisconsin, February 1992", except where the following conditions dictate otherwise.

2. The Department shall be notified one week in advance of Hydrite initiating fieldwork at the National Avenue Site. This gives the Department the opportunity to concur with Hydrite on the choice of boring locations and observe the investigation activities.

3. Hydrite shall make every attempt to locate the borings where there is a likelihood that hazardous waste or material has contaminated the subsurface, such as in cracks or in other breeches in the paved area.

4. The parameter list for the closure soil investigation shall consist of the following chemical constituents:

   arsenic
   chromium
   cyanide
   lead
   pH

   Except for pH, the above list of chemical constituents shall be analyzed using compositional analyses via acceptable EPA SW-846 methods. The method analyses for pH shall remain as SW-846 Methods 9040/9041.

5. The parameter list for the "NR 140 - Soil Characterization" investigation shall consist of the following chemical constituents:

   ammonium (ammonia nitrogen)
   cadmium
   chloride
   nickel
   pH
   phosphate
   nitrate & nitrite
   sulfate

   The above list of "NR 140 - Soil Characterization" chemical constituents shall be analyzed in a minimum of one sample per soil boring. Except for pH, cadmium and nickel, the proposed SW-846 Method 1312 Synthetic Precipitation Leaching Procedure (SPLP) shall be used to analyze for the above list of chemical constituents. The method analyses for pH shall remain as SW-846 Methods 9040/9041. Cadmium and nickel shall be analyzed using compositional analyses via acceptable EPA SW-846 methods.

6. Any soils excavated and handled on site as part of the closure and "NR 140 - Soil Characterization" investigations shall be evaluated to determine the appropriate waste classification for purposes of proper soil management.

7. Hydrite shall submit a report to the Department by June 1, 1993 documenting the results of the investigations. This report shall at a minimum include:

   a. all data results generated from the investigations.

   b. a discussion consisting of a description of the methods and procedures utilized to conduct the investigations and a summary of the major findings. If the investigations utilize procedures exactly as specified by published methods, then a reference to that method is sufficient. Any procedural changes to published methods shall be documented and supporting justification included.

   c. recommendations for follow-up closure action. If no further action on closure is needed, the report shall contain the certification statements of closure from the owner or operator and

an independent professional engineer, as outlined in s. NR 685.05(10). The report shall also contain a detailed narrative, chronologically describing and documenting the closure of the storage areas, including:

i. a discussion of the soil sampling results as compared to the established clean closure levels.

ii. a series of properly labeled color prints that document all major aspects of facility closure. This shall include panoramic views as well as close-up photos of the closed storage areas.

d. a detailed workplan for an additional groundwater investigation to address the Ch. NR 140, Wis. Adm. Code, groundwater exceedances.

8. The report required by condition #7, above, shall include an appendix that contains relevant references, all raw data (e.g., soil borings, soil sampling data, etc.), other supplemental data or information not previously presented, lab quality assurance/control data and statistical data calculations. Hydrite shall prepare, expand and/or up-date data tables, maps, forms and figures as needed. This shall include, but not be limited to the following:

a. Location and existing conditions maps
b. Constituent concentration or iso-concentration maps

Data generated from the soil investigations shall be presented in general conformance with ss. NR 512.12 and NR 512.13, Wis. Adm. Code, as applicable.

9. The report required by condition #7, above, shall be prepared in accordance with s. NR 680.05, Wis. Adm. Code, unless specifically exempted.

10. Copies of all submittals shall be sent to the WDNR Southeast District office (2 copies) and the WDNR Bureau office (2 copies).

11. The Department retains the right to modify this conditional plan approval and to require additional information at any time.

12. Nothing in this conditional closure plan approval modification shall relieve Hydrite of the legal obligation to comply with applicable federal, state and local requirements.

NOTIFICATION OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed.

For judicial review of a decision pursuant to sections 227.52 and 227.53, Statutes, as renumbered by the 1985 Wisconsin Act 182, you have 30 days after

the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

This notice is provided pursuant to s. 227.48(2), Statutes, as renumbered by the 1985 Wisconsin Act 182.

Dated: January 21, 1992

DEPARTMENT OF NATURAL RESOURCES
For the Secretary

Walter A. Ebersohl

Walter A. Ebersohl
Hazardous Waste Management Section Supervisor
Southeast District

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

WISCONSIN
DEPT. OF NATURAL RESOURCES

George E. Meyer
Secretary

Southeast District - Annex Building
Post Office Box 12436
4041 N. Richards St.
Milwaukee, Wisconsin 53212
TELEPHONE: 414-961-2727
TELEFAX #: 414-961-2770

January 25, 1995

In Response Refer To: FID#241020890
County of Milwaukee
HW/LIC/hydrcl.195

Tom Miazga, Director of Regulatory and Environmental Affairs
Hydrite Chemical Company
Drawer #0948
Brookfield, WI 53008-0948

RE: Hydrite Chemical Company - National Avenue Facility (Hydrite)
229 East National Avenue, Milwaukee, WI - EPA ID# WID006435895
Hazardous Waste Storage Closure Documentation Approval

Dear Mr. Miazga:

The department has reviewed the December 30, 1994 report titled, "Closure Documentation Report for Hydrite Chemical Company, 229 East National Avenue, Milwaukee, Wisconsin." This report was prepared on behalf of Hydrite by RMT, Incorporated. This report provides additional documentation on the closure activities at Hydrite. The department finds that this report along with previously submitted reports adequately document closure of the facility and satisfy the requirements of ch. NR 685, Wisconsin Administrative Code.

FINDINGS OF FACT

GENERAL INFORMATION

OWNER/OPERATOR: Hydrite Chemical Company
300 N. Patrick Blvd. (53045)
Drawer #0948
Brookfield, WI. 53008-0948

CONTACT: Tom Miazga, Dir. of Regulatory & Environmental Affairs
300 N. Patrick Blvd. (53045)
Drawer #0948
Brookfield, WI. 53008-0948
(414) 792-8796

CONSULTANT: RMT, Inc.
744 Heartland Trail
Madison WI 53708-8923
(608) 831-4444
David Martin, Senior Project Manager
Betty Socha, Senior Project Hydrogeologist
Thomas Stolzenburg, Senior Consultant
Kathryn Huibregtse, P.E., Program Manager

FACILITY LOCATION: The Hydrite Chemical Company - National Avenue facility is located on the near southeast side of the city of Milwaukee, Wisconsin (NE 1/4, NE 1/4, SE 1/4, Section 32, T7N, R22E, Milwaukee County), approximately 800 feet west of the Milwaukee Harbor. The address for the facility is as follows:

Hydrite Chemical Company
229 East National Avenue
Milwaukee, WI 53204

The department finds that:

1. Hydrite filed a notification of hazardous waste activity form on November 18, 1980, with U.S. EPA. An interim license was issued by the department to Hydrite on January 19, 1983, allowing the facility to store hazardous waste at the site.

2. In a November 15, 1988, letter to the department, Hydrite announced their intent to close the National Avenue facility. On January 31, 1989, the department acknowledged Hydrite's intent to close the National Avenue facility. On May 26, 1989, Hydrite through their consultant Triad Engineering submitted a revised hazardous waste facility closure plan. A public notice of Hydrite's intent to close their hazardous waste facility was published in the Milwaukee Sentinel on August 24, 1989.

3. Hydrite stopped receiving waste from off-site in March 1990. As of June 28, 1990, all of the hazardous waste storage tanks had been emptied and cleaned, and the last amount of hazardous waste stored on-site was removed.

4. Hydrite submitted a document dated March 1991 and titled "Additional Subsurface Exploration - Hydrite Chemical Company - 229 East National Avenue - Milwaukee, Wisconsin." This document was prepared by Giles Engineering Associates, Inc. on behalf of Hydrite and presented the results of additional soil and groundwater analyses performed on samples collected from the Hydrite facility.

5. Hydrite submitted a February 3, 1992, document titled "Amended Closure Plan/Remedial Action Plan - Hydrite Chemical Company - National Avenue Site - Milwaukee, Wisconsin - February 1992."

6. The department issued a conditional closure plan approval modification on December 21, 1992, to Hydrite. This conditional closure plan approval modification allowed Hydrite to proceed to implement the proposed closure soil investigation and a ch. NR 140, Wisconsin Administrative Code, soil characterization investigation.

7. Hydrite submitted a May 1993 report titled, "Documentation Report Underground Storage Tank Abandonment at the Hydrite Chemical Facility, 229 East National Avenue, Milwaukee, Wisconsin."

8. Hydrite submitted a June 14, 1993, document titled "RCRA and NR 140 Soil Investigation Results for Hydrite Chemical Company Facility - 229 East National Avenue - Milwaukee, WI". The report contains the results of soil sampling, statistics used to obtain background values, and Hydrite's conclusions.

9. The department issued on August 25, 1994, a conditional closure plan approval modification to Hydrite.

10. On September 29, 1994, the department performed a hazardous waste storage facility compliance inspection at Hydrite. The facility was no longer in operation and no hazardous waste was observed at the site.

11. On October 14, 1994, Hydrite performed soil excavations at three locations at the National Avenue site. Soils from excavation walls and floors were sampled and analyzed.

12. Hydrite submitted a December 30, 1994, report titled, "Closure Documentation Report for Hydrite Chemical Company, 229 East National Avenue, Milwaukee, Wisconsin." This report provided additional documentation on the closure activities at the Hydrite - National Avenue facility.

13. The department performed a closure verification inspection at Hydrite on January 18, 1995. No hazardous waste was observed on-site. The last of the total of four luger boxes of excavated soils was manifested off the site on October 31, 1994.

CONCLUSIONS OF LAW

1. The department has promulgated chs. NR 600 through 685, Wisconsin Administrative Code, establishing the procedures for closures of hazardous waste storage facilities under the authority of ss. 144.60 through 144.74, Wisconsin Statutes.

DETERMINATION

The department hereby determines that Hydrite's hazardous waste interim licensed storage facility has been closed in accordance with the facility's approved closure plan. The inspection along with the closure documentation reports verify that the hazardous waste storage areas have been closed in substantial conformance with the facility's approved closure plan. The interim license issued on January 19, 1983 for hazardous waste storage is now terminated.

Closure of Hydrite as a storage facility does not affect any of Hydrite's requirements to comply with the public health groundwater quality standards, ch. NR 140, Wisconsin Administrative Code, or any of the federal or state corrective action requirements, (42 U.S.C. § 6924(u)&(v), and § 6928(h); s. 144.735, Wisconsin Statutes and chs. NR 600 through 685, Wisconsin Administrative Code.)

Further investigation and remediation may still be required by the Environmental Repair section (contact person is Margaret Graefe (414) 961-2725), regarding the contamination remaining on site not associated with Hydrite's previous hazardous waste operations.

To initiate the release of your proof of financial responsibility for closure, a written request must be submitted to the Southeast District office.

NOTIFICATION OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that Wisconsin statutes and administrative rules establish time periods within which requests to review department decisions must be filed.

For judicial review of a decision pursuant to sections 227.52 and 227.53, Statutes, you have 30 days after the decision is mailed, or otherwise served by the department, to file your petition with the appropriate circuit court and serve the petition on the department. Such a petition for judicial review shall name the department of Natural Resources as the respondent.

This notice is provided pursuant to s. 227.48(2), Statutes.

If you have any questions or comments feel free to call Patrick Brady of my staff at (414) 961-2717.

Sincerely,

Walt Ebersohl

Walter A. Ebersohl
Hazardous Waste Management Section Supervisor
Southeast District

Patrick J. Brady
Waste Management Engineer

C. W. Ebersohl/P. Brady - SED Casefile
E. Lynch/C. English - SW/3
C. Slaustas - U.S. EPA Region 5, 5HRP/8J
M. Graefe - ER&R Section
Kathryn Huibregtse - RMT, Inc.

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

February 6, 1987 IN REPLY REFER TO: 4430

Mr. Charles Clarke
Manager of Regulatory Affairs
Hydrite Chemical Company
2655 North Mayfair Road
Milwaukee, WI 53226

SUBJECT: Hydrite Chemical Company
RCRA Facility Assessment
WID 006 435 887

Dear Mr. Clarke:

Enclosed is a copy of RCRA Facility Assessment (RFA) prepared by the Department of Natural Resources for Hydrite facility located at 221 East Oregon Street, Milwaukee, Wisconsin. The recommendation of this report reflects the Department's findings.

The purpose of the RFA is to:

1. Identify the solid waste management units at the facility
2. Define the existence and the extent of the releases at these units
3. Determine the scope of work necessary for corrective action

The RFA has been prepared in accordance with the corrective action requirements of the Hazardous and Solid Waste Amendments (HSWA) of 1984 to RCRA. HSWA requires that all RCRA treatment storage or disposal facilities be assessed to determine the need for corrective action. We have sent copies of this RFA to EPA Region V.

The RFA recommends that Hydrite performs a limited soil investigation at the solid waste management units identified in this report. The investigation should be conducted by a professional consulting firm with experience in this type of work. The Recommendation Section of the report should be followed in developing such an investigation. The Department recommends that the soil investigation be done as part of the facility's closure.

The Department feels that Hydrite's cooperation in conducting the soil investigation will determine whether a corrective action order is needed at the site. Please send us any comments that you have on this RFA. If you have any questions, please contact Don Scheele at (608) 266-5425 or Ed Lynch at (608) 266-3084.

Sincerely,

Richard E. O'Hara

Richard E. O'Hara, Chief
Hazardous Waste Management Section
Bureau of Solid Waste Management

REO:JA:jmc/9538V
Enc.

cc: Frank Schultz - SED
Margaret Graefe/Fred Johnson - SED
Ed Lynch - SW/3
Chuck Slaustas - 5HS/13
Hazardous Waste Management Section
Peter Constant - Avganic Ind.

RCRA FACILITY ASSESSMENT (RFA)
NARRATIVE SUMMARY

FACILITY: Hydrite Chemical Company

EPA ID #: WID-006 435 887

LOCATION: 221 East Oregon Street
Milwaukee, WI 53204
Milwaukee County

FACILITY CONTACT: Charles Clarke, Manager of Regulatory Affairs
(414) 257-2300

WDNR CONTACTS: Don Scheele, Engineer,
Hazardous Waste Management Section
Bureau of Solid Waste Management
(608) 266-5425

Margaret Graefe, Hazardous Waste Specialist
Southeast District Headquarters
(414) 562-9651

Fred Johnson, Hazardous Waste Specialist
Southeast District Headquarters
(414) 562-9685

RCRA FACILITY ASSESSMENT (RFA)

Hydrite Chemical Company

TABLE OF CONTENT

OVERVIEW

Hydrite Chemical Company, located at 221 E. Oregon Street, Milwaukee, Wisconsin, EPA I.D. No. WID006435887, repackaged, compounded, and distributed industrial chemicals. The facility is currently undergoing closure. The facility stored ignitible, corrosive and listed solvent hazardous waste. The location of the facility is shown in Figs. 1 and 2.

Hydrite acquired the property in April of 1976. As is shown in Fig. 2, the Hydrite Chemical site is separated into three (3) sections by Oregon and Barclay Streets. The facility consisted of ten (10) buildings. The facility is located outside the 100-year floodplain of the Milwaukee River.

Hydrite submitted a Notification of Hazardous Waste Activity on August 15, 1980 and a hazardous waste Part A permit application on November 18, 1980. A second Part A permit application was submitted on November 5, 1982 and was revised on December 23, 1982 in order to accurately reflect the site activities. On January 19, 1983, the facility was issued an Interim License by Wisconsin DNR. The Interim License covered a storage capacity of 109 55-gallon drums (two drum storage areas) and 6 above-ground tanks. The maximum allowable storage capacity in drums and tanks was 67,095 gallons.

The U.S. EPA called-in Hydrite's Part B application on August 5, 1982. The review of the Part B application was conducted by the Wisconsin DNR. The Department transmitted four incompleteness letters to EPA, dated March 29, 1983, September 12, 1983, January 30, 1984, and May 14, 1984. The Department also transmitted three technical inadequacy letters to EPA, dated September 10, 1984, December 14, 1984, and May 30, 1985.

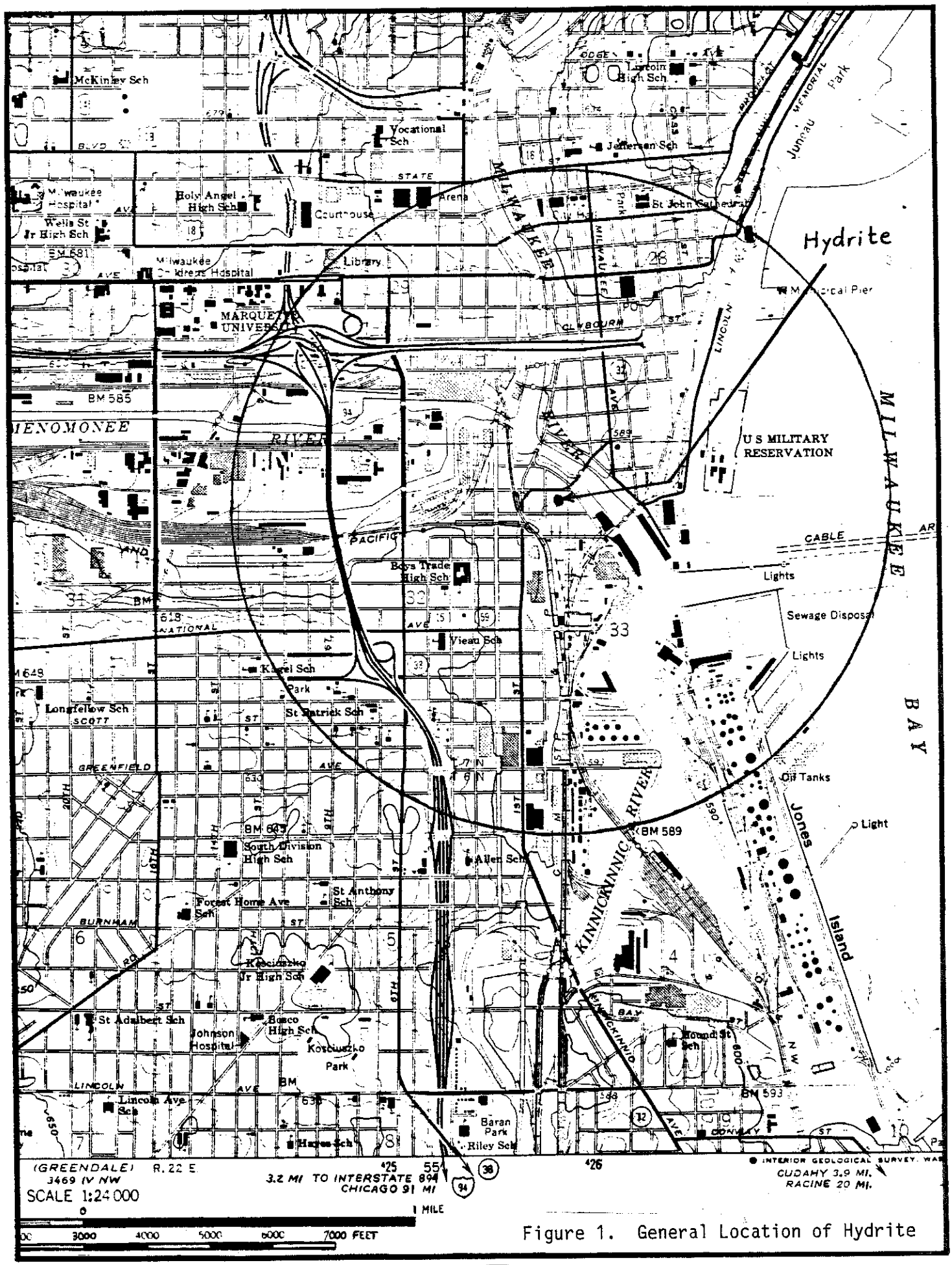
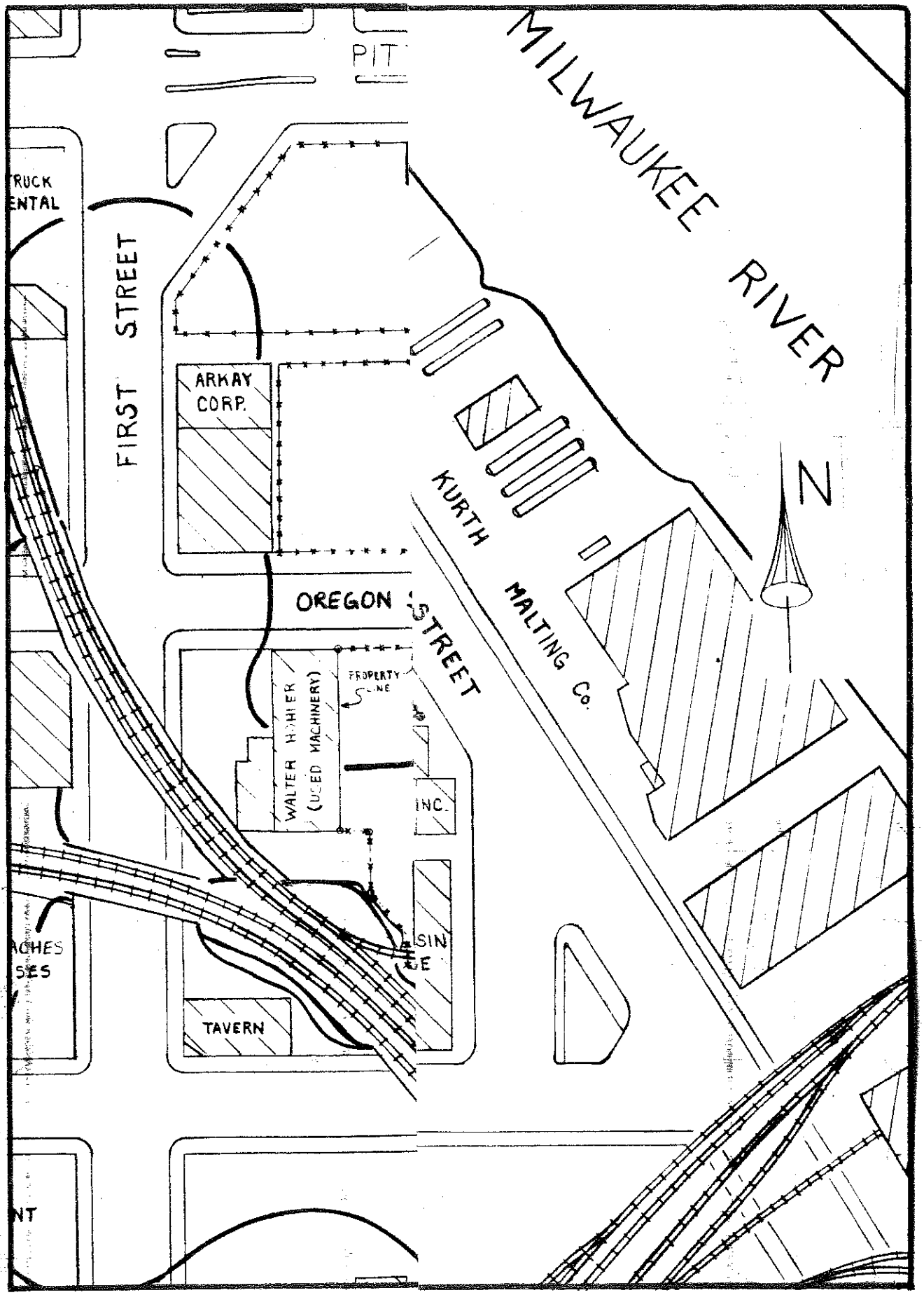


Figure 1. General Location of Hydrite


MILWAUKEE RIVER
N
FIRST STREET
ARKAY CORP.
KURTH MALTING Co.
OREGON STREET
WALTER H. HIER (USED MACHINERY)
PROPERTY LINE
INC.
TAVERN
SCALE: 1" = 100'

On October 9, 1985, Hydrite notified the Department of its intention to close the storage areas at this facility. On April 11, 1986, Hydrite was issued a notice of incompleteness by the WDNR regarding Hydrite's closure plan. A second notice of incompleteness was issued by the Department to Hydrite on September 16, 1986.

The facility stored and treated hazardous waste. Hazardous waste handled at the facility included:

- D001: Ignitable wastes
- F001: Spent halogenated solvents used in degreasing
- F002: Spent Halogenated solvents
- F003: Spent non-halogenated solvents
- F005: Spent non-halogenated solvents
- D002, K062: Spent pickle liquor from steel finishing operations (also corrosive), Spent Phosphoric Acid

Hazardous waste was stored using both 55-gallon drums and above-ground tanks. The ignitable and spent solvent were stored at the site before being shipped to Hydrite's facility (now Avganic Industries) at Cottage Grove, Wisconsin for reclamation. The acid wastes were received in 55-gallon drums and/or bulk tanker trucks. The waste was then pumped into the above-ground storage tanks. The spent phosphoric acid was received by Hydrite from customers mostly in the aluminum industry (bright dipping), and was analyzed for percentage of phosphoric acid. The waste acid was then adjusted while being stored in the tanks to the required concentration of phosphoric acid by adding virgin acid or water and sold as a fertilizer feed stock to fertilizer industries or as a nutrient for activated sludge treatment systems. Hydrite would manifest the spent acid as D002, but on May 31, 1984 EPA asked the facility to use the hazardous waste code K062 instead. The facility also incinerated hazardous wastes.

The adjustment of percent phosphoric acid in the spent acid and selling it as a product is considered a hazardous waste treatment operation under Chapter NR 181 regulations. The facility did not obtained a DNR operating license for hazardous waste treatment. Hydrite claimed that their treatment was an exempt process under Chapter NR 181, Recycling Regulations. Although the treatment may be an exempt process, Hydrite did not obtain a written approval from the Department.

The facility was first inspected by WDNR personnel on February 23, 1981, and Hydrite was found to be in violation of hazardous waste regulations covering personnel training records and contingency plans. The facility was inspected again by Department personnel on June 17, 1982, and Hydrite was issued a Notice of Noncompliance regarding their waste analysis plan, inspection schedule and log, contingency plans, personnel training program, closure plan, operating records, waste containment, and manifest records. Hydrite was also inspected on September 29, 1983 and was issued a Notice of Violation (NOV) of their Interim License and of Chapter NR 181, Wisconsin Administrative Code. The areas of violation were:

- Exceeding their maximum allowable storage capacity,
- Storage of hazardous waste not specified in their Interim License,
- Failure to comply with conditions No. 9 and No. 10 of their Interim License regarding the facility's contingency plan,
- Not complying with waste analysis plan specifications,
- Keeping improper and/or incomplete manifest records,
- Keeping incomplete operating records,
- Failure to confine run-on and run-off discharges from the waste acid storage area.

A second Notice of Violation (NOV) was issued to Hydrite by the Department on March 27, 1985 regarding:

- Removing the three above-ground feeding/storage tanks (included in Hydrite's Interim License) from the incinerator area without obtaining a prior approval from the Department, and thus, violating Condition #4 of the facility's Interim License, and

- Neither reporting nor documenting a hazardous waste spill of phosphoric acid at Hydrite's facility at National Avenue, EPA I.D. No. 006 435 895.

Hydrite responded to the second NOV, and during the inspection performed by DNR personnel on May 8, 1985, the facility was found to be in compliance and the NOV was closed out as of May 13, 1985.

A Facility Management Plan (FMP) prepared for this facility by the Department on March 26, 1986, raised concerns that undocumented releases may have occurred at the site. These concerns had resulted from inadequate hazardous waste management by Hydrite. The FMP concluded that this facility was environmentally significant.

SOLID WASTE MANAGEMENT UNITS (SWMUs)

Hydrite indicated in their Variance Request Form, submitted to the Department on December 11, 1981, that they were operating four (4) types of Solid Waste Management Units (SWMUs): container storage, tank storage, tank treatment, and incineration.

The facility, in their most recent Part A permit application (submitted to the Department on December 23, 1982), identified only two (2) types of SWMUs: container storage and tank storage. Hydrite submitted their "Certification Regarding Potential Releases from Solid Waste Management Units" to EPA on June 10, 1985. In the submittal, Hydrite did not mention the tank treatment and the incinerator units. Although the units may be considered as beneficial uses of hazardous waste under Chapter NR 181 recycling regulations, Hydrite did not obtain exemptions from the Department for such operations. Four (4) SWMUs were identified and are discussed in this RCRA Facility Assessment (RFA). These units are:

- Container Storage Area (Building #34),
- Outside Container Storage Area,
- Tank Farm, and
- Incinerator and Feeding and/or Storage Tanks

UNIT DESCRIPTION:

1. Container Storage Area (Building #34):

   This container storage area is located within the first floor of Building #34 west of Barclay Street as shown in Figure 3. The building was designed for the manufacturing of laquer paints which use nitrocellulose. The first floor of the building is provided with two ramps to access a loading/unloading dock west of the building. The area was used to store waste solvents and ignitable waste (D001, F001, F002, F003, and F005) before being analyzed and shipped to Hydrite's Cottage Grove, Wisconsin facility for reclamation.

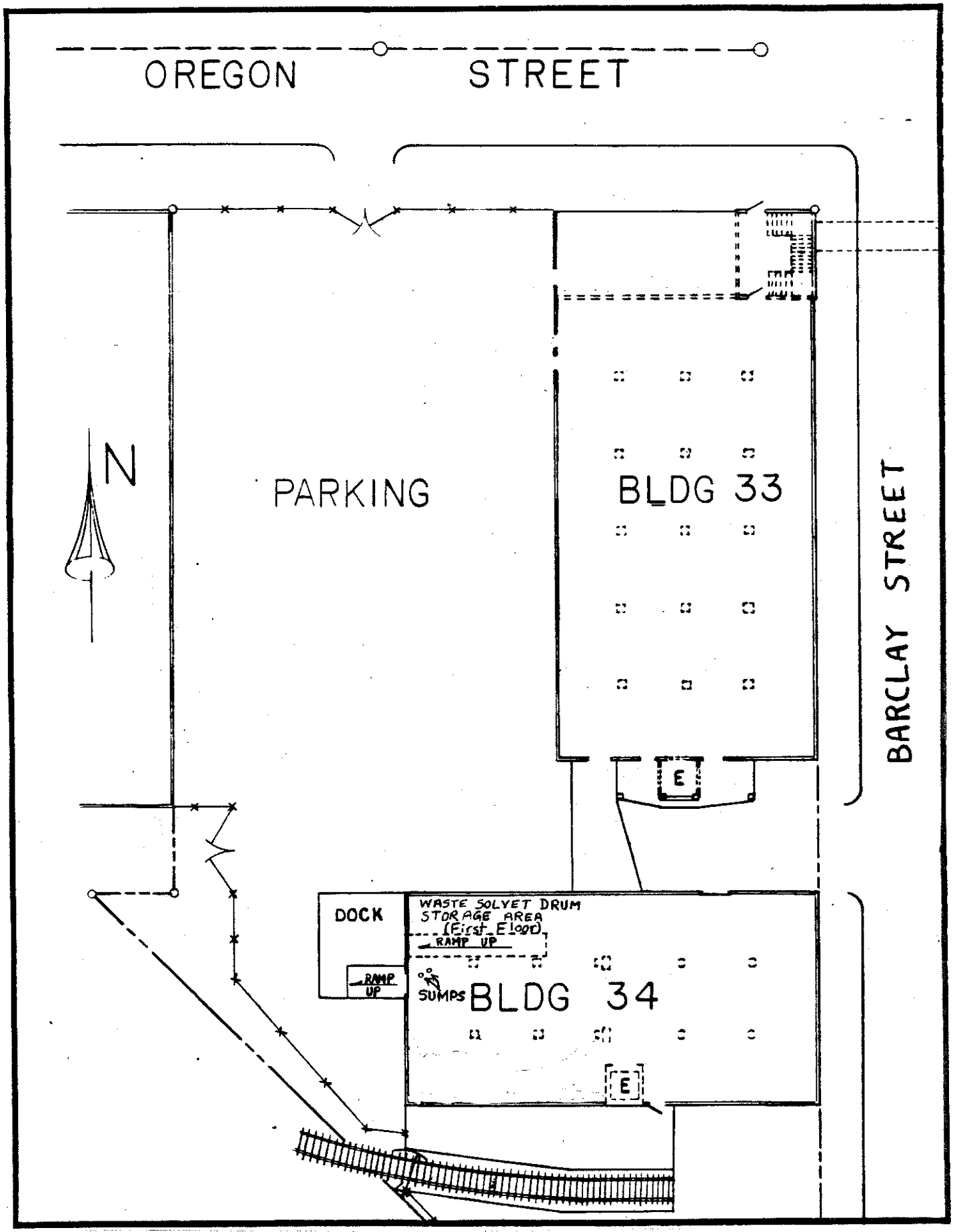


Figure 3. Spent Solvent Container Storage Area (Building #34)

The containers were generally 55-gallon drums and were stored on pallets with four drums per pallet. The drums were stacked up to three (3) drums high.

The storage area is not diked and is not provided with secondary containment. The floor of the storage area is constructed of reinforced concrete and it has a few cracks. The floor of the storage area is sloped toward the inside ramps, which is constructed over a pit. It is unknown if the pit has a concrete or a soil base. The floor has two sumps in front of the door that leads to the outside ramp, as shown in Figure 3. Each sump is about 2 feet in diameter and 3-4 feet high. The sumps have concrete walls. It is unknown if the sumps have concrete or soil bases. Further, there are two wall drains (scuppers) near the storage area that drain directly outside the building. The door leading to the outside ramp has no curb. The outside ramp has a concrete wall at its southern edge, but the ramp's wall is not sealed into the wall of the building, and there is an opening about 1 inch wide between the two walls. Spills near the door or on the ramp itself would have drained into the soil adjacent to the opening. The area around the loading-unloading dock is also not curbed, and soils around the dock may be contaminated due to leaks on the dock's surface.

Hydrite sold Building #34 to Wayne Chemical Corporation, EPA I.D. No. WID-000809038. Spent solvents were last stored in Building #34 in drums in September of 1985.

2. Outside Container Storage Area:

An outside container storage area is located at the eastern end of the facility as shown in Figure 4. The area was used to store 55-gallon spent acid drums. The area has a maximum storage capacity of 100 55-gallon drums (5,500 gallons). The drums were stored on pallets and stacked up to two (2) drums high.

The storage area has separate, but adjoining, concrete slabs with many cracks. No secondary containment or spill control measures are provided for the storage concrete slabs. The pad is sloped toward the southeastern corner. A curb of about 6 inches high is provided at the southeastern corner, however, it is not adequate to prevent runoff discharges from the storage area. Further, the concrete floor is not coated to protect it from any acid leakage.

3. Tank Farm:

The tank farm was located at the eastern end of the facility northwest of the outside container storage area as shown in Figure 4. There were 11 tanks. Hydrite designated the tanks by numbers 3, 4, 5, 6, 7, 8, 9, 10, 11, 16, and 17. Four separate diked tank areas exist at the tank farm as shown in Figure 4. All dikes were constructed of concrete and they had adequate capacity to contain the full content of the largest tank. Figure 4 shows that tanks 11 and 16 were not diked and/or provided with secondary containments.

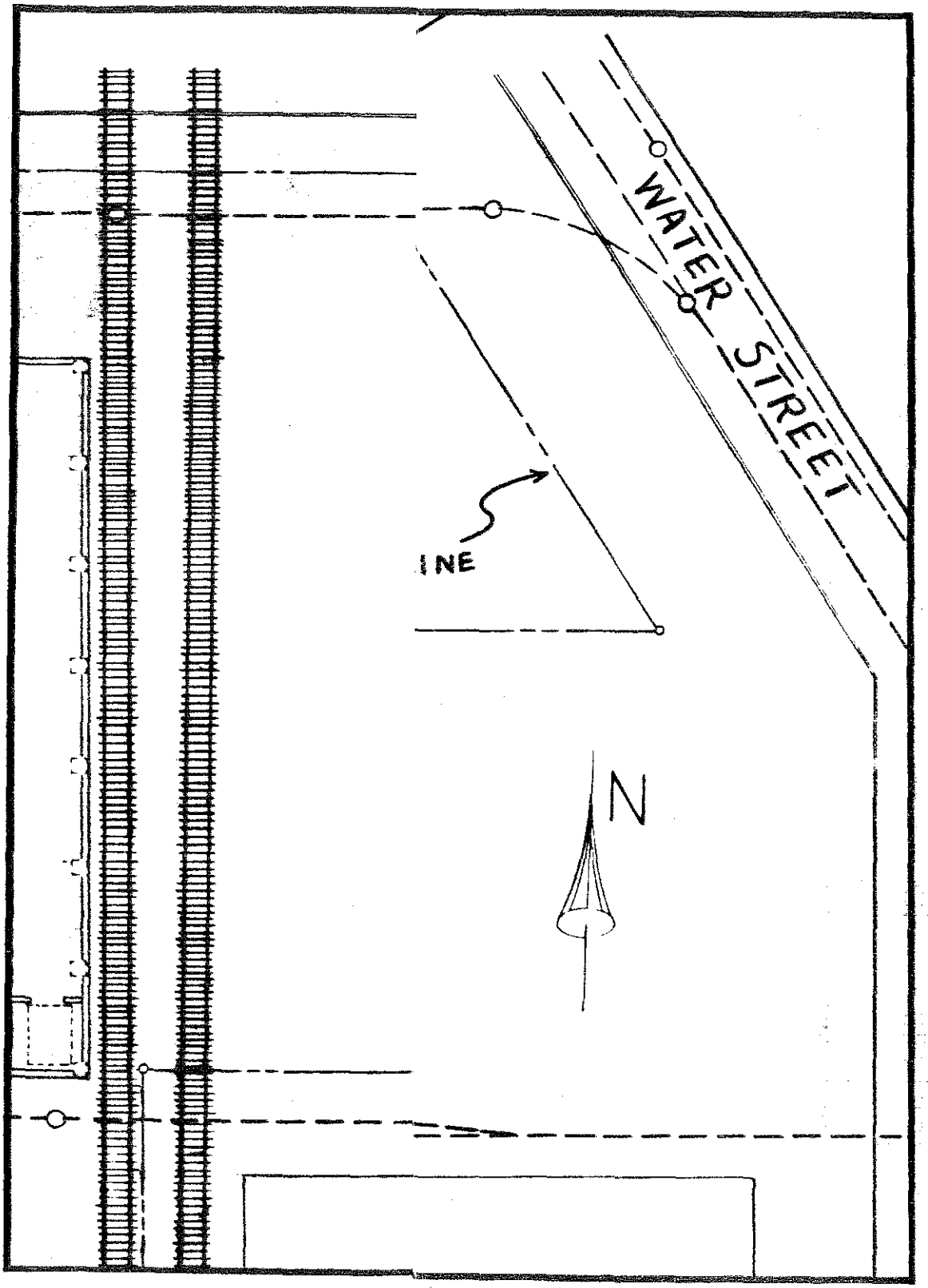


Figure LE: 1" = 100'

The diked tank farm area has a soil base. Tank 16 is constructed on a concrete pad, but it was not diked. All tanks were constructed of steel and were not provided with automatic overfilling cut-off controls. The levels of liquid stored in the tanks were identified using a stick.

Tanks designated by numbers 3, 4, 5, 6, 7, 8, 9, 10, and 11 were constructed in the late 1940's. Hydrite occupied the property in April of 1976. Tanks numbers 8, 16, and 17 were the only tanks included in Hydrite's Interim License. These tanks were used to store spent phosphoric acid. Spent acid was last stored in these tanks in December of 1985. Spent acid shipments were being received from customers in drums or bulk and then transferred to the storage tanks for treatment. The treatment was being performed by adjusting the phosphoric acid content to the desired level by adding virgin phosphoric acid or water. The treated material was then being sold as a feed stock to fertilizer industries or as a nutrient for activated sludge treatment systems. The volume and lining materials of each tank are as follows:

Tank #	Volume (Gallons)	Liner Material
8	10,000	Fiberglass & Resin
16	13,800	PVC
17	15,300	Fiberglass & Resin

On March 6, 1986, Hydrite informed the Department of their intent to move tanks 16 and 17 into Hydrite's facility at National Avenue EPA I.D. No. WID 006435895. The Department approved the transfer of the tanks upon documenting their proper closure.

Hydrite submitted a letter to the Department on April 2, 1986 documenting the tank's closure and the transfer of the tanks into Hydrite's facility at National Avenue. Hydrite stated that soil samples were collected around the perimeter of the tanks' locations. The samples were tested for pH. The minimum pH value of 6 was measured. Hydrite did not specify the number of samples taken or their exact locations.

In October of 1986, the new owner of the property dismantled tanks numbered 5, 6, 7, and 8, removed the dikes around these tanks, and regraded the former dike area with a soil fill without Hydrite obtaining any approval from the Department. Tank 8 was a hazardous waste storage tank.

Currently, only tanks 3 and 4 remain at the tank farm area. These tanks were not part of Hydrite's Interim License. However, Hydrite reported that they stored hazardous waste (paint laquer thinner) in tank 4. Testing of tank contents showed that the tanks contained hazardous materials. IT Corporation (contracted by Hydrite) submitted documentation dated September, 1986 of a complete decontamination of tank 4 and a partial decontamination of tank 3. Decontamination of tank 3 was completed by Hydrite. No testing of the soil within and/or outside the dike of tanks 3 and 4 has been performed. The Department has not yet approved the Hydrite's closure plan of the tanks.

4. Incinerator and Feeding and/or Storage Tanks:

Hydrite operated an incinerator using hazardous waste as a secondary fuel for heating purposes until May of 1983. The hazardous wastes consisted of still bottoms (manifested as D001, F003, or F005) from Hydrite's reclamation operations at the Cottage Grove, Wisconsin facility. Hot gases from the incinerator were transferred to a recovery boiler to convert water to steam. The incinerator also used natural gas to assist in start-up combustion and when combustion temperatures became too low. Hazardous wastes were incinerated at 90 gal/hr rate. The sulfur content in the still bottoms were not to exceed 0.38%. The ash generated from incinerating the still bottoms was a hazardous waste and was disposed of accordingly. Hydrite indicated that they stored the ash in the incinerator building for no more than 90 days.

Three tanks were constructed next to the incinerator. The incinerator and the tanks were located north of Oregon Street as shown in Fig. 5. The tanks capacities were 6,000, 6,000 and 15,000 gallons, and the tanks were designated as East Tank, West Tank, and Mix Tank, respectively. The tanks were placed on concrete bases. The tank area has a concrete dike of a 20,000 gallon capacity. Still bottom hazardous wastes were being transferred into the tanks by a gear pump from semi trucks. In March, 1985, Hydrite moved the east and west tanks into Hydrite's facility at Cottage Grove and sold the mix tank without prior approval by the Department. This constituted unapproval closure of these units. Hydrite dismantled the incinerator in October of 1984.

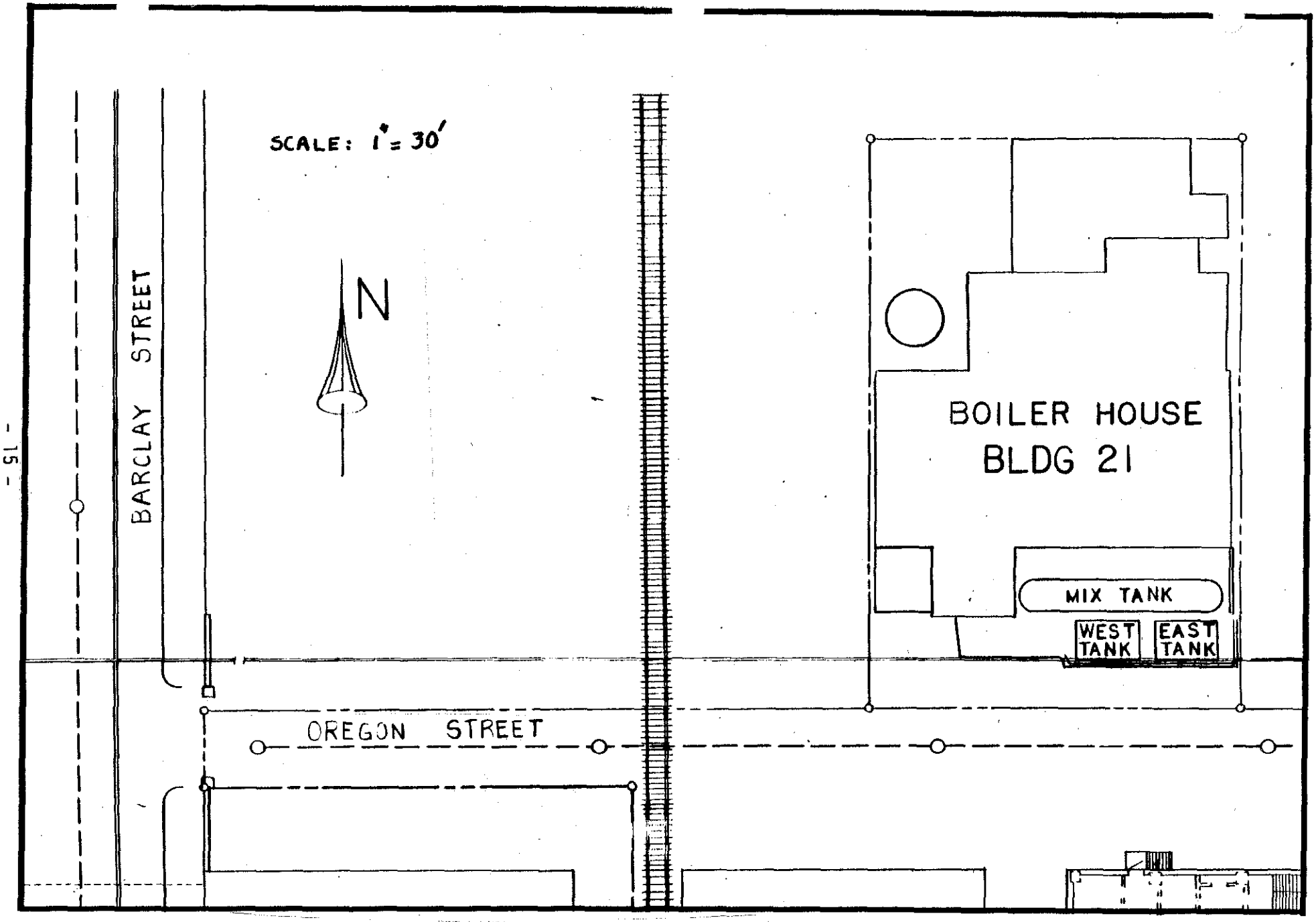


Figure 5. Incinerator and Storage/Feeding Tanks

The area of the incinerator and the tanks was leased by Hydrite from Transpak, Inc. The property was turned back to Transpak in the spring of 1986. In the summer of 1986, Transpak demolished the building and completely regraded the whole area of the incinerator and the feed tanks. Hydrite did not obtain an approval from the Department to close this SWMU. No soil testing at the unit area has been done.

KNOWN AND/OR SUSPECTED RELEASES

The facility was first inspected by the Wisconsin DNR on February 23, 1981. In the inspection form, it was reported that in malfunction of a valve on-line to the incinerator caused a leak. No more information is available about that leak.

On September 29, 1983, Hydrite was inspected by Wisconsin DNR. During the inspection, DNR personnel observed soil discoloration (staining) and a small accumulation of surface water around the undiked outside container storage area (spent acid storage area). Soil discoloration and small surface water accumulation were caused by run-offs from the storage concrete pad. Leaking empty drums stacked on their sides, after their contents were pumped into storage tanks, were believed to be the source of contamination.

Hydrite did not report the spent acids release to the Department before it was observed by DNR personnel. Further, the facility did not include this release in their "Certification Regarding Potential Releases..." submittal to EPA on June 10, 1985. Mr. Clarke of Hydrite mentioned several times to DNR personnel that minor leaks had occurred at the storage areas, but the leaks were cleaned properly. Hydrite did not document in writing any of such releases or cleanups.

Poor management of hazardous wastes has been a common practice at Hydrite. During the inspection conducted on September 29, 1983, 10 drums were observed being stored outside Building #34 (not a licensed storage area). One drum was labeled as hazardous waste from Eygptian Laquer Mfg. Co., EPA I.D. No. IND 002178291, EPA waste code K078, and dated May 11, 1981. The facility is not licensed to accept K078 hazardous wastes. All drums were full. Mr. Clarke of Hydrite did not know what was in the drums, and the drums were not identified in the facility's records. During the same inspection, another group of 11 drums was observed being stored outside the hazardous waste incinerator. The drums were not labeled and Mr. Clarke did not know what was their content. Again, that was not a licensed container storage area.

On October 15, 1982, it was found during an inspection by DNR that Hydrite was incinerating hazardous wastes as a secondary fuel which was not generated by Hydrite.

Hydrite did not operate secure hazardous waste storage areas. Hazardous waste storage tanks did not have automatic cut-off control measures to prevent overfilling. The storage tank farm diked area has a soil base, and one spent acid storage tank is located outside the dike. Spent solvent container storage area within Building #34 has no dike. The spent acid drum are stored on an outside concrete pad of no secondary containment and/or spill control measures.

As a results of the above discussion, Wisconsin DNR believes that undocumented releases of hazardous waste have occurred at Hydrite.

TARGET POPULATIONS AND/OR ENVIRONMENTS POTENTIALLY EXPOSED

The facility is located in the City of Milwaukee near and southwest of the Milwaukee River which discharges into Lake of Michigan. Both the Milwaukee River and Lake Michigan are classified for recreation and fishery purposes. The vicinity of the facility is an industrial area. The distances of SWMUs at Hydrite from the river were as follows:

SWMU	Distance from the Milwaukee River (feet)
Container Storage Area (Building #34)	950
Outside Container Storage Area	400
Tank Farm	400
Incinerator and Feeding/Storage Tanks	500

Groundwater flows presumably east and northeast toward the river. Ground surface has a slight slope toward the east. Contamination of surface waters may reach the Milwaukee River through storm sewers that discharge into the river. Review of water well logs showed no indication of any type of well between the facility and the river. Drinking water is provided to the area through the City of Milwaukee, which uses Lake Michigan as a raw water supply.

RECOMMENDATIONS:

Hydrite Chemical Co. had stored and incinerated hazardous wastes at this facility. One release incident of spent phosphoric acid was observed by WDNR personnel during the inspection on September 29, 1983. Hydrite did not voluntarily report that release and did not include it in their "Certification Regarding Potential Releases..." submittal to EPA on June 10, 1985.
Mr. Clarke of Hydrite has also indicated to DNR personnel that minor leaks had

occurred at the facility and were cleaned up. No documentations of such leaks were submitted to the Department. Hydrite has performed several modifications and partial closures of hazardous waste management units without obtaining any approval from the Department for such actions. Hazardous wastes were stored in unlicensed storage tanks (tanks 3 and 4), and hazardous waste containers were stored at unlicensed storage areas.

Hydrite sold its property before performing approved closure of the SWMUs at the facility. Only tanks 3 and 4 (located at the tank farm) are left on the property.

Soil samples were collected around the spent acid storage tanks (tanks 8, 16 and 17). Only pH measurement was performed for the samples. Minimum pH value measured was 6.0. Hydrite did not specify the number of samples collected or exact sample locations. No other soil sampling was conducted.

The Department should require that Hydrite conduct limited soil sampling and testing program before or as part of the Department approvals of the closure plan for tanks 3 and 4, accepts the closure of other Solid Waste Management Units (SWMUs), and revokes Hydrite's Interim License. Soil samples should be collected, and analyzed as follows:

1. Samples should be collected and analyzed for Volatile Organic Compounds (VOCs) at:

   - container storage area (Building #34),
   - incinerator and feeding/storage tanks, and
   - tank farm area around tanks #3 and #4.

2. Samples should be collected and analyzed for pH at:

- tank farm area around tanks 8, 16 and 17, and

- outside container storage area.

The samples should be collected from the areas that are suspected to be contaminated from run-offs and hazardous waste releases as identified in the Unit Description Section of SWMUs.

The soil investigation will determine the level and the extent of contamination if any exists at the site. The soil investigation will indicate if a corrective action order is needed for this facility.

9186V

LIST OF ATTACHMENTS

A. EPA Attachment 25 - Preliminary Assessment Report
B. EPA Attachment 26 - Site Investigation Report
C. EPA Exhibit 3-2 - Checklist for Ground Water Releases
D. EPA Exhibit 4-1 - Checklist for Surface Water/Surface Drainage Releases

Attachment A: EPA Attachment 25 - Preliminary Assessment Report

Attachment 25 Revised 1/31/86
DNR Rec'd 4/3/86

Facility name: Hydrite Chemical Co.
EPA ID # WID 006 435 887
Name of Preparer: Jamal Awad
Date: January 26, 1987

Preliminary Assesment Report

The questions constituting this Preliminary Assesment (P.A.) Report must be filled out prior to completion of recommendation elements of the Plan. The purpose of this P.A. is to provide a summary documentation of the State and/or U.S. EPA review of available information on the subject facility. The intent is that a comprehensive file review will be conducted as the basis for selection of the recommended approach to a given facility. If the P.A. is completed by State personnel, questions referring to available data reference information in State files; for Federal personnel the reference is to Federal files. Where questions refer to "all" available data or information and such material is columinous, the response should indicate that files are voluminous, and then reference most telling information, for example, groundwater contaiminants found frequently or at extremely high concentrations should be specifically listed, and information most directly supporting recommended approach to facility should be described. If no information is available in facility files, the response should so indicate. It is also anticipated that this P.A. may be updated periodically as more information becomes available.

1. Interim Status and/or Permitted Hazardous Waste Units and Capacities of Each Unit:

Type of Units	Size or Capacity	Active or Closed
X Storage in Tanks or Containers	two drum storage areas with total storage capacity of 109 55-gallon drums.	closed
___ Incinerator	six above-ground storage tanks with total storage capacity of 61,100 gallons.	closed
___ Landfill		
___ Surface Impoundment		
___ Waste Pile		
___ Land Treatment		
___ Injection Wells		
___ Others (Specify)		

2. Permit Application Status: Hydrite performed closure and sold the property before obtaining an approval from the Department

- ☐ completeness review underway
- ☐ technical review underway
- ☐ complete and technically adequate
- ☐ draft permit public noticed
- ☐ final permit issued

3. Sources of data used in developing this document:

- ☑ RCRA Part A & B permit application
- ☑ Certification Regarding Potential Releases Solid Waste Management Units
- ☐ Interim Status inspection Reports/Information from Letters of Warning and Compliance Orders
- ☐ Exposure Information Report
- ☐ Other RCRA submittals: ACL submissions, closure plans, post-closure permit applications, etc
- ☐ CERCLA PA/SI Reports
- ☐ CERCLA Hazard Ranking System (HRS) Information
- ☐ CERCLA RI/FS Studies
- ☑ CERCLA 103(c) Notifications (check this even if the absence of a notification was verified)
- ☐ Aerial Photography
- ☐ USGS data: maps, geological atlas, monitoring well data
- ☐ USDA Soil Conservation Service maps/data
- ☐ Graphic Exposure Modelling System
- ☑ State Hazardous Waste Management Permit files/ inspection reports
- ☐ State Wastewater Treatment Discharge Permit files/inspection reports

- [x] State Air Permit files/inspection reports
- [ ] TSCA Inspection Reports
- [ ] OSHA Inspection Reports
- [ ] Municipal/Country/City Public Health Agencies
- [ ] Local Well Drillers
- [ ] State/Country Road Commissions
- [ ] Utilities
- [ ] Local Airports/Weather Bureaus
- [ ] Naturalist/Environmental Organizations
- [ ] Employees
- [ ] Colleges/Universities
- [ ] Interviews with local residents
- [ ] Public Notice

4. The facility is on the National Priorities List or proposed update of the List or proposed update of the List or ERRIS list

_____ Yes - indicate List or update

__✓__ No

_____ Yes - ERRIS list

Description of Enforcement Status: None

5. Type of Action | Date | Local, State or Federal | Result or Status

6. Review of Response to Solid Waste Management Questionaire indicates: (check one)

___✓___ Solid Waste Management Units ~~exist~~ existed (other than previously identified RCRA units) Questionaire indicates no SWMUs

_____ No Solid Waste Mangement Units exist (other than previously identified RCRA units)

_____ It is unclear from review of questionaire whether or not any Solid Waste Management Units exist

_____ Respondent indicates that does not know if any Solid Waste Management Units exist

7. If the response to question 6 is that Solid Waste Management Units exist, then check one of following:

___✓___ Releases of hazardous waste or constituents have occurred or are thought to have occurred

_____ Releases of hazardous waste or constituents have not occurred

_____ Releases of hazardous waste or constituents have occurred or are thought to have occurred but have been adequately remedied

_____ It is not known whether a release or hazardous waste or constituents has occurred

8. Description of Any Complaints from Public: None

Source of Complaint	Date	Recipient	Subject and Response

9. Description of All Inspection Reports for Facility:

Date of Inspection	Inspector (Local, State, Federal)	Conclusions or Comments
February 23, 1981	WDNR	Notice of Non-compliance
June 17, 1982	WDNR	Notice of Non-compliance
September 29, 1983	WDNR	Notice of Violation
March 14, 1985	WDNR	Notice of Violation

10. During inspection of this facility did the inspector note any evidence of past disposal practices not currently regulated under RCRA such as piles of waste or rubbish, injection wells, ponds or surface impoundments that might contain waste or active or inactive landfills? No

_____ Yes- give date if inspection and describe observation

_____

_____

_____

__✓__ No _____ Don't know

11. Do inspection reports indicate observations of discolored soils or dead vegetation that might be caused by a spill, discharge or disposal of hazardous wastes or constituent?

__✓__ Yes - indicate date of report and describe observations

September 29, 1983 - DNR personnel observed soil discoloration (staining) and a small accumulation of surface water around the undiked outside spent acid storage area.

_____ No

_____ Don't know

12. Do inspection reports indicate the presence of any tanks at the facility which are located below grade and could possible leak without being noticed by visual observation?

_____ Yes - date of inspection and describe information in report

_____

_____

_____

__✓__ No

_____ Don't know

13. Does a groundwater monitoring system exist at the facility? No

14. If an answer to question 12 is yes, is the groundwater system capable of monitoring both regulated RCRA units and other Solid Waste Management Units? N/A

Explain - _____

_____

_____

15. Is the groundwater monitoring system in compliance with applicable RCRA groundwater monitoring standards? N/A

If no, explain deficiency _____

_____

_____

16. Describe all information on facility subsurface geology or hydrogeology available.

Type of Information	Author	Date	Summary of Conclusions
Information on facility subsurface geology or hydrogeology is not available. Hydrite is located near and southwest of the Milwaukee River. Groundwater flows presumably east and northeast toward the river.			

17. Did the facility submit a 103(c) notification pursuant to CERCLA?

_____ Yes Date of Notification _____

✓ No

18. If answer to 17 is yes, briefly summarize content of that notification. (waste management units identified, type of waste concerned) N/A

19. Has a CERCLA Preliminary Assessment/Site Investigation (PA/SI) been completed for this facility?

_____ Yes

__✓__ No

20. If answer to question 19 is yes, briefly describe conclusions of the PA/SI focusing on types of environmental contaimination found, wastes and sources of contaimination. N/A

21. If available, having reviewed the CERCLA notification, RCRA Part A and RCRA Part B, it appears that: (CERCLA Unit refers to units or area of concern in CERCLA response activity) N/A

_____ RCRA and CERCLA units are same at this facility

_____ RCRA and CERCLA units are clearly different units

_____ There is an overlap between the RCRA and CERCLA units (some are the same, some are different)

22. Description of Any Past Releases or Environmental Contamination:

Type/Source of Release	Date	Material Released	Quantity	Response
Leaking empty drums at outsid container storage area	9/29/83	Spent phosphoric acid	Unknown	Hydrite claimed there was not any release. Test of standing water gave pH = 6.1 (Hydrite letter to DNR dated December 1983.

23. Identification of Reports or Documentation Concerning Each Release Described in Item 22.

Title/Type of Report	Date	Author	Recipients	Contents
Notice of Violation	Sep 29, 1983	DNR	Hydrite	Notice of Violation
letter	Dec 1, 1983	Hydrite	DNR	Test of standing water indicated a pH value of 6.1 (not hazardous)

24. Highlight any information gaps relating to the existence of solid waste management units additional needed information.

Soil testing should be performed at SWMUs to check for any contamination.

25. SUMMARY

List the solid waste management units at this facility (other than tanks and container storage areas for holding wastes with no hazardous constituents):

Unit	Are hazardous constituents present in the waste (yes/no)?	Is it reasonable to suspect a release (yes/no)?	Next Step: (a) site investigation workplan (b) plan of study for remedial investigation (c) corrective action plan (d) no further action required
1. Container Storage Area (Building #34)	yes	yes	a site investigation should be conducted and then followed by a corrective action plan if needed
2. Outsid Container Storage Area	Yes	yes	
3. Tank Farm	Yes	yes	
4. Incinerator and Feeding/Storage Tanks	Yes	yes	
5.			
6.			
7.			
8.			
9.			
10.			

Complete and attach the "Assesment of Unit" form for each unit with "yes" answers in both of the first two columns.

26. Summary of exposure potential

Yes	No	
☐	☑	Public is now drinking water contamination with wastes from the facility;
☐	☑	Public is at risk of exposure through direct contact to wastes contained at or releasing from the facility; and
☐	☑	Public is at risk from exposure from breathing hazardous wastes releasing from the RCRA facility.
☑	☐	The following information is needed to determine whether the public is at risk:

Soil investigation at SWMUs

☑	☐	The solid waste management units at this facility do not appear to present a threat to public health at this time.

27. Based on my review of this Preliminary Assesment, it is hereby

☐ approved

☐ not approved

Signature: _____ Date: _____
(EPA Staff)

Assessment of Unit

Description of Unit: Container Storage Area (Building #34)

Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Unit: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, a treated, Stored or Disposed (note appropriate categories)
Spent halogenated and non-halogenated Solvents D001, F001, F002, F003, and F005	Variable	Stored

Assessment of Unit

Description of Unit: Outside Container Storage Area

Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Unit: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, a treated, Stored or Disposed (note appropriate categories)
Spent phosphoric acid (corrosive)	Variable	Stored

Assessment of Unit

Description of Unit: Tank Farm

Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Unit: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, a treated, Stored or Disposed (note appropriate categories)
- Spent phosphoric acid (corrosive) Tanks # 8, #16, and #17	Variable	Stored + treated
- Hydrite stored paint Laquer thinner in unlicensed tank #4		Stored

Assessment of Unit

Description of Unit: Incinerator and Feeding and/or Storage Tanks

Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Unit: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, a treated, Stored or Disposed (note appropriate categories)
Still bottoms D001, F003, and F005	Variable	Stored and incinerated
Ash		Stored

Attachment B: EPA Attachment 26 - Site Investigation Report

Attachment 26 Revised 1/31/86
DNR Rec'd 4/3/86

Facility name: Hydrite Chemical Co.
EPA ID # WID 006 435 887
Name of Preparer: Jamal Awad
Date: January 26, 1987

Site Investigation Report

1) During the inspection of this facility did the inspector note any evidence of past waste disposal practices not currently regulated under RCRA such as piles of waste or rubbish, ponds or surface impoundments that might contain waste, active or inactive landfills?

_____ a) Yes, Explain _____

_____

✓ b) No

_____ c) Cannot Respond to this Question

2) Was there any evidence of discolored soils or dead vegetation that might be caused by a spill, discharge or disposal of hazardous wastes or constituents?

✓ a) Yes, Explain Inspection during Sep 29, 1983 - DNR personnel observed soil discoloration (staining) and a small accumulation of surface water around the undiked outside spent acid container storage area.

_____ b) No

_____ c) Cannot Respond to this Question

3) Are there any tanks at the facility which are used for waste storage (solid or hazardous) which are located below grade and could possibly leak without being noticed by visual observation?

_____ a) Yes

✓ b) No

_____ c) Cannot Respond to this Question

4) Based on an inspection or inspections that have been done at this facility there is no reason to question or doubt the information which the applicant has submitted on the questionnaire regarding Solid Waste Management Units and the possibility of prior or continuing releases of hazardous wastes or constituents.

_____ a) I concur with this statement

✓ b) I do not concur with this statement for the following reasons:
The facility did not include hazardous waste treatment and incineration in their Certification Submittal. Hydrite had a poor hazardous waste management practices and the Department believes that there have been undocumented releases at the facility

5) If 4(b) was checked,
Describe what additional information or testing is needed to determine if prior or continuing releases of hazardous wastes or constituent have occurred. Specify which units are of concern and what types of releases are suspected (i.e., releases to groundwater, surface water, air, soils, etc).

Soil investigation should be conducted to document any contamination at SWMUs. The units are identified in the RFA and the types of releases suspected are established.

6) An on site inspection to discuss and evaluate the possibility of prior or continuing releases from Solid Waste Management Units is recommended

____ a) Yes

✓ b) No

7) Was site sampling for confirmation of suspected releases conducted?

____ a) Yes

✓ b) No

8) If yes to 7, detail the following: N/A

1) Sampling plan - include locating parameters to be tested. rationale for each parameter, logistics, dates, personnel etc.

2) Analytical results - QA, QC. Result summary conclusion.

9) A Remedial Investigation (R.I.) is needed to evaluate the nature and extent of prior releases of hazardous wastes or constituents from Solid Waste Management Units.

✓ a) Yes

____ b) No.

10. If the answer to No. 9 above is "Yes", the priority and manner for requiring the applicant to conduct the Remedial Investigation (R.I.) is as follows: Hydrite should be required to conduct a site investigation as part of their closure. If Hydrite is not willing to conduct such an investigation a compliance order should be issued to the facility

   ___/___ a) Require R.I. in compliance schedule that is part of RCRA permit.

   ___/___ b) Issue Compliance Order requiring R.I. to be done.

11. Did the SI address all items that the PA "Assessment of Unit" forms indicated the SI should address?

   _____

   _____

12. Based on my review of this S.I. report, it is hereby:

   ☐ approved

   ☐ not approved

Signature _____ (EPA Staff) Date: _____

Attachment C: EPA Exhibit 3-2 - Checklist for Ground Water Releases

Exhibit 3-2

Checklist for Ground Water Releases

Identifying Releases	Yes	No
1. Potential for Ground Water Releases from the Unit		
o Unit type and design		
- Does the unit type (e.g., land-based) indicate the potential for release?	✓	—
- Does the unit have engineered structures (e.g., liners, leachate collection systems, proper construction materials) designed to prevent releases to ground water?	—	✓
o Unit operation		
- Does the unit's age (e.g., old unit) or operating status (e.g., inactive, active) indicate the potential for release?	—	✓
- Does the unit have poor operating procedures that increase the potential for release?	—	✓
- Does the unit have compliance problems that indicate the potential for a release to ground water?	—	✓
o Physical condition		
- Does the unit's physical condition indicate the potential for release (e.g., lack of structural integrity, deteriorating liners, etc.)?	✓	—
o Locational characteristics		
- Is the unit located on permeable soil so the release could migrate through the unsaturated soil zone?	not known	—
- Is the unit located in an arid area where the soil is less saturated and therefore a release has less potential for downward migration?	—	✓
- Does the depth from the unit to the uppermost aquifer indicate the potential for release?	not known	—
- Does the rate of ground water flow greatly inhibit the migration of a release from the facility?	not known	—
- Is the facility located in an area that recharges surface water?	✓	—

Exhibit 3-2 (continued)

Checklist for Ground Water Releases

	Yes	No
o Waste characteristics		
- Does the waste in the unit exhibit high or moderate characteristics of mobility (e.g., tendency not to sorb to soil particles or organic matter in the unsaturated zone)?	✓	—
- Does the waste exhibit high or moderate levels of toxicity?	✓	—
2. Evidence of Ground Water Releases		
o Existing ground-water monitoring systems		
- Is there an existing system?	—	✓
- Is the system adequate?	—	✓
- Are there recent analytical data that indicate a release?	—	✓
o Other evidence of ground water releases		
- Is there evidence of contamination around the unit (e.g., discolored soils, lack of or stressed vegetation) that indicates the potential for a release to ground water?	✓	—
- Does local well water or spring water sampling data indicate a release from the unit?	—	✓
Determining the Relative Effect of the Release on Human Health and the Environment		
1. Exposure Potential		
o Conditions that indicate potential exposure		
- Are there drinking water well(s) located near the unit?	—	✓
- Does the direction of ground water flow indicate the potential for hazardous constituents to migrate to drinking water wells?	—	✓

Attachment D: EPA Exhibit 4-1 - Checklist for Surface Water/Surface Drainage Releases

Exhibit 4-1

Checklist for Surface Water/Surface Drainage Releases

	Yes	No
Identifying Releases		
1. Potential for Surface Water/Surface Drainage Releases from the Facility		
o Proximity to Surface Water and/or to Off-site Receptors		
- Could surface run-off from the unit reach the nearest downgradient surface water body?	✓	—
- Could surface rud-off from the unit reach off-site receptors (e.g., if facility is located adjacent to populated areas and no barrier exists to prevent overland surface run-off migration)?	—	✓
o Release Migration Potential		
- Does the slope of the facility and intervening terrain indicate potential for release?	✓	—
- Is the intervening terrain characterized by soils and vegetation that allow overland migration (e.g., clayey soils, and sparse vegetation)?	unkown	—
- Does data on one-year 24-hour rainfall indicate the potential for area storms to cause surface water or surface drainage contamination as a result of run-off?	✓	—
o Unit Design and Physical Condition		
- Are engineered features (e.g., run-off control systems) designed to prevent releases from the unit)?	—	✓
- Does the operational history of the unit indicate that a release has taken place (e.g., old, closed or inactive unit, not inspected regularly, improperly maintained)?	✓	—
- Does the physical condition of the unit indicate that releases may have occurred (e.g., cracks or stress fractures in tanks or erosion of earthen dikes of surface impoundments)?	✓	—

Exhibit 4-1 (cont.)

Checklist for Surface Water/Surface Drainage Releases

	Yes	No
o Waste Characteristics		
- Is the volume of discharge high relative to the size and flow rate of the surface water body?	—	✓
- Do constituents in the discharge tend to sorb to sediments (e.g., metals)?	—	✓
- Do constituents in the discharge tend to be transported downstream?	✓	—
- Do waste constituents exhibit moderate or high characteristics of persistence (e.g., PCBs, dioxins, etc.)?	—	✓
- Do waste constituents exhibit moderate or high characteristics of toxicity (e.g., metals, chlorinated pesticides, etc.)?	✓	—
2. Evidence of Surface Water/Surface Drainage Releases		
o Are there unpermitted discharges from the facility to surface water that require an NPDES or a Section 404 permit?	—	✓
o Is there visible evidence of uncontrolled run-off from units at the facility?	—	✓

Determining the Relative Effect of the Release on Human Health and the Environment

1. Exposure Potential		
o Are there drinking water intakes nearby?	—	✓
o Could human and/or environmental receptors come into contact with surface drainage from the facility?	✓	—
o Are there irrigation water intakes nearby?	Unknown	
o Could a sensitive environment (e.g., critical habitat, wetlands) be affected by the discharge (if it is nearby)?	✓	—

Hydrite Chemical Company
WID 006435887
221 East Oregon Street
Milwaukee, WI 53204

D.1.2

Facility Contact:

Charles Clarke,
Manager of Regulatory Affairs,
(414) 257-2300

Permit Status and Compliance History:

Hydrite submitted the RCRA Part A forms on November 19, 1980. A hazardous waste facility inspection on June 17, 1982 found many items of NR 181 non-compliance at the facility, including their waste analysis plan, inspection schedule and log, contingency plan, personnel training program, closure plan, operating records, waste containment and manifest records. Another inspection in September of 1983 resulted in a Notice of Violation being issued to Hydrite on October 28, 1983. This NOV addressed several of the above-mentioned deficiencies which had not been satisfied. An inspection on May 5, 1985 found the facility in compliance and this NOV was closed out as of May, 13, 1985.

The WDNR issued an interim license to Hydrite on January 19, 1983 for operation of a hazardous waste storage facility. The interim license allows for 6,000 gallons of container storage and 61,100 gallons of above-ground tank storage.

The U.S. EPA called-in Hydrite's Part B application on August 5, 1982. The Part B review was conducted by WDNR. The Department transmitted four incompleteness letters to EPA, dated 3/29/83, 9/12/83, 1/30/84 and 5/14/84. Also, WDNR transmitted two technical inadequacy letters to EPA, dated 9/10/84 and 12/14/84.

On October 9, 1985 Hydrite notified WDNR of its intention to close the storage areas at this facility. WDNR sent an acknowledgment letter to Hydrite and described the procedure to be followed in the pursuit of closure. Procedural items which need to be followed include:

- Public notice and request for comments regarding the facility's closure plan. The public notice was printed in the January 8, 1986 issue of the Milwaukee Sentinel. No comments were received.

- Department review and approval, denial or modification of the closure plan,

- Following implementation of the closure plan, a Departmental review of closure documentation and an inspection to verify closure activities. It is likely that closure will be completed before any corrective actions occur.

Solid Waste Management Units and Releases:

The facility has previously indicated four types of SWM units (container storage, tank storage, tank treatment, incineration). Their most recent Part B submittal contained only container and tank storage; however, their HSWA "Certification Regarding Potential Releases" form indicated that no other SWM units exist or existed. The HSWA response should have mentioned the tank treatment and incinerator units.

Also, the HSWA "Certification..." response indicated that no prior or continuing releases of hazardous waste or constituents have occurred or are occurring. However, at least one release did occur only three months prior to their HSWA response submittal. That release was detected during a routine hazardous waste facility inspection. An unknown quantity of phosphoric acid and contaminated run-off were observed in the acid storage area. This release was one item included in a Notice of Violation dated March 27, 1985. The NOV was closed out on June 17, 1985 after Hydrite furnished the necessary information to WDNR.

Although additional documentation does not exist regarding waste or product releases to the environment, the Department believes that additional releases appear likely to have occurred. The Department bases this belief on several facts. First, the Department became aware of the phosphoric acid release by unacceptable means; Hydrite did not voluntarily notify WDNR of the discharge in a timely manner. It is doubtful that Hydrite would have eventually voluntarily notified the Department regarding the spill containment, clean-up, disposal and environmental restoration activities. Second, the facility handles a large volume of hazardous wastes. Their June 28, 1984 RCRA Part B submittal indicated that the facility handles an estimated 35 million gallons of waste annually (D001, F001, F002, F003, F005 types). Third, the storage tanks are not equipped with automatic waste feed cut-offs, high level alarms, or liquid level gauges. The tank storage areas are partially concrete base and partially soil base, but in all cases, run-off control or secondary containment does not exist. Finally, other hazardous waste facilities with similar waste handling and operating procedures, and which annually handle a considerably smaller quantity of waste, have more release incidents and/or documented soil and groundwater contamination when compared to Hydrite. For all of the reasons listed above, the Department believes that more than the one known hazardous waste release is likely to have occurred at Hydrite's facility.

Recommendations

The Hydrite facility at 221 E. Oregon Street has had a documented hazardous waste release for which clean-up activities have been performed. However, the facility did not voluntarily notify the Department of these release. It appears probable that additional, undocumented releases may have occurred. Therefore, additional facility management planning work appears necessary. These activities should include a RCRA preliminary assessment and site investigation. The PA should determine the specific areas at the facility where waste releases are likely to have occurred. The SI may include soil sampling and testing at those areas identified in the PA. The Department feels that Hydrite should continue to maintain RCRA interim status after closure activities are completed in order to assure that corrective action activities are performed.

This facility appears to be environmentally significant.

Name Rick Krueger

Date March 26, 1986

FMP File Search Results

Facility Hydrite Chemical Company

EPA I.D. WID 006435887

Notification File RCRA Part A submitted November 1980. Haz. Waste Notice of Violation on October 28, 1983, and again on March 27, 1985. October 1985 Intent to Close letter received by WDNR. Public Notice for Hydrite's closure received no comments.

Part B File Called-in during August 1982. Four incompleteness letters sent to facility. Two technical inadequacy letters.

CERCLA File Not on CERCLIST. No CERCLA file. PA/SI has not been done.

Pretreatment / Iww Files No manufacturing at this facility, thus there is no pretreatment necessary. Facility is warehouse, beending and repackaging only.

Residuals Files Collection & Transport License # 11237 (6,000 gallon tank wagon and two 85 cubic yard van trailers). Authorized for solvents

Air Permit File Class A2 facility. Particulates controls. Actual emissions are ≤ 10% of allowable quantities. No violations on file. Boiler/Incinerator permit cancelled (unit disassembled 1983).

Public Water Supply VOC record Facility is located near Milwaukee River's discharge to Lake Michigan. No drinking water wells in the area.

Discussion with District Mike Zillmer, Sandy Miller and Erv Van Zummeren are all assigned different aspects of the facility, but are not too familiar with it.

Add additional sheets as necessary

NAME OF PREPARER Rick Krueger PREPARER IS: USEPA EMPLOYEE ☐

STATE EMPLOYEE ☒

DATE March 26 1986

TREATMENT, STORAGE, DISPOSAL FACILITY INITIAL SCREENING FOR ENVIRONMENTAL SIGNIFICANCE

FACILITY NAME Hydrite Chemical Company

FACILITY ID # WID 006435887

FACILITY LOCATION 221 East Oregon Street
STREET ADDRESS

Milwaukee	Milwaukee	Wisconsin	53204
CITY	COUNTY	STATE	ZIP CODE

LIST ALL CURRENT INTERIM STATUS PROCESS CODES

S01 S02

LIST ALL PROCESS CODES PROPOSED IN PART B APPLICATION (IF APPLICABLE)

S01 S02 (BUT FACILITY HAS WITHDRAWN FROM THE RCRA PERMITTING PROCESS AND INTENDS TO CLOSE)

INSTRUCTIONS

FOR EACH OF ITEMS 1 THROUGH 11 BELOW, MARK ONE AND ONLY ONE BOX, BASED ON YOUR KNOWLEDGE OF THE FACILITY. USE THE "RATING DISCUSSION" TO ELABORATE, IF DESIRED. NOTE THAT ANY ENVIRONMENTAL CONCERN RATING OF HIGH CONSTITUTES YOUR RECOMMENDATION THAT THIS FACILITY IS "SUFFICIENTLY ENVIRONMENTALLY SIGNIFICANT" TO WARRANT PREPARATION OF A FACILITY MANAGEMENT PLAN. IN ORDER FOR YOU TO RECOMMEND THAT A FACILITY MANAGEMENT PLAN NEED NOT BE PREPARED, EACH AND EVERY ITEM MUST BE MARKED EITHER LOW OR N/A.

Environmental Concern Rating

	HIGH	LOW	N/A
1. Rate concern relative to the CERCLA Program, and discuss -(National Priority List sites should automatically be high concern; significant past handlers of CERCLA cleanup wastes should automatically be high concern; facilities that have absolutely no 'CERCLA connection' should be rated N/A)	☐	☐	☒
2. Rate concern relative to status as a commercial handler, and discuss -- (facilities that handle significant amounts of waste from a variety of sources should be rated high; (facilities that handle only their own company's off-site waste could be rated low; facilities that only handle on-site generated wastes should be rated N/A)	☒	☐	☐
3. Rate concern relative to facility's financial condition (facilities which have or are expected to declare financial insolvency should be rated high)	☐	☒	

RATING DISCUSSION: No CERCLA INVOLVEMENT OR WASTES AT THIS FACILITY.

RATING DISCUSSION: FACILITY HANDLES 35 MILLION GALLONS OF WASTES (D001, F001, F002, F003, F005) PER YEAR, AND IS PRIMARILY A STORAGE AREA FOR OFF-SITE GENERATED WASTES PRIOR TO SHIPMENT FOR RECYCLING.

RATING DISCUSSION:

	Environmental Concern Rating		
	HIGH	LOW	N/
4. Rate concern relative to facility's 40 CFR Part265 compliance status/history, (High Priority Violators and Significant Non-Compliers should be rated high; for proposed facilities, rating is N/A)	[X]	[ ]	[ ]
RATING DISCUSSION: OCTOBER 28, 1983 AND MARCH 27, 1985 NOTICES OF VIOLATIONS FOR NR181 / INTERIM LICENSE VIOLATIONS.			
5. Based on the waste management processes employed (to be employed) at the facility, rate the concern, and discuss -- (processes subject to ground water monitoring will most often dictate a rating of high; incinerators will most often dictate a rating of high; "contained" storage/treatment such as in drums/tanks will most often rate low)	[X]	[ ]	
INCINERATOR OPERATED UNTIL 1983, RATING DISCUSSION: CONTAINER STORAGE INDOORS ON CONCRETE FLOORS, CONTAINER STORAGE OUTDOORS ON CONCRETE (SLOPING SOUTH TOWARD ALLEY) WITHOUT CONTAINMENT, TANK STORAGE OUTDOORS ON CONCRETE AND SOIL AND NO AUTOMATIC SHUTOFFS OR HIGH LEVEL ALARMS.			
6. Based on the presence, absence, significance of old Solid Waste Management Units & whether releases from old or current units are known, suspected, corrected; rate the concern, and discuss -- (known & seriously suspected releases should dictate a rating of high, unless felt to be insignificant/de minimis)	[ ]	[X]	
RATING DISCUSSION: T01 AND T03 (TANK & INCINERATOR TREATMENTS) HAD BEEN LISTED ON PREVIOUS RCRA PART A's. INCINERATOR WAS DISASSEMBLED IN 1983 AND BURNED WASTE OIL AND STILL BOTTOMS.			

	Environmental Concern Rating		
	HIGH	LOW	N/A
7. Rate concern, based only on the volume and type of waste handled, and discuss -- (low volumes of extremely toxic wastes could rate a high; very heavy volumes of waste could rate a high, though wastes are not particulary dangerous)	[X]	[ ]	
RATING DISCUSSION: MARCH 1984 RCRA PART A INDICATES 35 MILLION GALLONS OF HAZARDOUS WASTES HANDLED PER YEAR AS MAXIMUM CAPACITY.			
8. Rate concern relative to facility's NON-hazardous waste general environmental regulatory status/history, and discuss --	[ ]	[X]	[ ]
RATING DISCUSSION: No AIR MANAGEMENT OR RESIDUALS MANAGEMENT OR WASTEWATER VIOLATIONS			
9. Rate concern relative to facility's physical location(proximity to population or to sources of accidents or dangers which would tend to increase the facility's inherent danger)	[ ]	[X]	
RATING DISCUSSION: GENERAL AREA IS COMMERCIAL AND INDUSTRIAL. MILWAUKEE FIRE DEPARTMENT FIREHOUSE ABOUT 1,000 FEET AWAY. MILWAUKEE RIVER FLOWS ABOUT 800 FEET TO THE NORTHEAST OF THE FACILITY.			

Environmental Concerr Rating

10. Rate public concern, for whatever reason

HIGH	LOW	N/A
☐	☒	

RATING DISCUSSION: No public comment received during the recent public notice for closure. No public opposition in any files.

11. Other

☐	☐	☐

DISCUSS: _____

WID 006435887

BASED ON ABOVE ANALYSIS, RECOMMENDATION IS THAT

HYDRITE CHEMICAL

FACILITY NAME

IS ENVIRONMENTALLY SIGNIFICANT AND A FACILITY MANAGEMENT PLAN WILL BE PREPARED	[X]
IS NOT, AT THIS TIME, CONSIDERED TO BE ENVIRONMENTALLY SIGNIFICANT, AND A FACILITY MANAGEMENT PLAN WILL NOT BE PREPARED	[ ]

SUMMARY OF FACILITY SCREENING FOR ENVIRONMENTAL SIGNIFICANCE

FACILITY NAME HYDRITE CHEMICAL COMPANY

FACILITY ID # WID 006435887

	Environmentally Significant	
	YES	NO
STATE'S RECOMMENDATION OF MARCH 26 1986 DATE	[X]	[ ]
U.S. EPA RECOMMENDATION OF _____ DATE	[ ]	[ ]
JOINT STATE - U.S. EPA DETERMINATION	[ ]	[ ]

Discussion of resolution of issues, if any, in arriving at joint recommendation. Include date(s), location, participants at any resolution meetings.

7/15/85

Attachment 20

Name of Preparer: RICK KRUEGER
Date: MARCH 26 1986

Model Facility Management Plan

1. Facility Name: HYDRITE CHEMICAL COMPANY

2. Facility I.D. Number: WID 006435887

3. Owner and/or Operator: HYDRITE CHEMICAL CO.

4. Facility Location: 221 E. OREGON ST.
Street Address

MILWAUKEE	MILWAUKEE	WI	53204
City	County	State	Zip Code

5. Facility Telephone (if available): (414) 257-2300

6. Interim Status and/or Permitted Hazardous Waste Units and Capacities of Each Unit:

Type of Units	Size or Capacity	Active or Closed
X Storage in Tanks or Containers	6,000 GALLONS S01	ACTIVE
	159,000 GALLONS S02	ACTIVE
X Incinerator	WASTE OIL AND RECLAMATION STILL BOTTOMS BURNED AT 90 gpd ACCORDING TO THE AIR PERMIT OR 5400 gphour ACCORDING TO HYDRITES PART A SUBMITTAL.	CLOSED DURING 1983
____ Landfill		
____ Surface Impoundment		
____ Waste Pile		
____ Land Treatment		
____ Injection Wells		
____ Others (Specify)		

7. Permit Application Status: MOVING TOWARD CLOSURE (HWDMS action item number)

8. Identification of Hazardous Waste Generated, Treated, Stored or Disposed at the Facility: (may attach Part A or permit list or reference those documents if listing of wastes is exceptionally long - in that case, to complete this question list wastes of greatest interest and/or quantity and note that additional wastes are managed)

Type of Waste	Quantity	Generated, Treated, Stored or Disposed (note appropriate categories)
(D001, F001, F002, F003, F005)	35 MILLION GALLONS PER YEAR	ARE STORED PRIOR TO TRANSPORT OFF-SITE TO RECLAMATION.
(D002, K062)	156,000 GALLONS PER YEAR	ARE STORED PRIOR TO TRANSPORT TO MUNICIPAL WASTEWATER TREATMENT FACILITIES.

9. Review of Response to Solid Waste Management Questionaire indicates: (check one)

__X__ Solid Waste Management Units exist (other than previously identified RCRA units) QUESTIONAIRE INDICATES NO SWMUs.

_____ No Solid Waste Management Units exist (other than previously identified RCRA units)

_____ It is unclear from review of questionaire whether or not any solid Waste Management Units exist

_____ Respondent indicates that does not know if any Solid Waste Management Units exist

10. If the response to question 9 is that Solid Waste Management Units exist, than check one of the following:

__X__ Releases of hazardous waste or constituents have occurred or are thought to have occurred

_____ Releases of hazardous waste or constituents have not occurred

_____ Releases of hazardous waste or constituents have occurred or are thought to have occurred but have been adequately remedied

_____ It is not known whether a release of hazardous waste or constituents has occurred

11. The facility is on the National Priorities List or proposed update of the List or ERRIS list

_____ Yes - indicate List or update

__X__ No

_____ Yes - ERRIS list

Prior to completion of the Recommendation portion of the Facility Management Plan, the attached Appendix must be completed.

12. Recommendation for Regional Approach to the Facility: Check one

__X__ Further Investigation to Evaluate Facility

_____ Permit Compliance Schedule

_____ Corrective Action Order (may include compliance schedule)

_____ Other Administrative Enforcement

_____ Federal Judicial Enforcement

_____ Referral to CERCLA for Federally Financed or Enforcement Activity

_____ Voluntary/Negotiated Action

_____ State Action

Brief narrative in explanation of selection : FACILITY HAS INDICATED ITS INTENT TO CLOSE. PAST ORGANIC SOLVENT RELEASES APPEAR HIGHLY PROBABLE. RCRA PA/SI SHOULD INVESTIGATE ON-SITE SOILS (LIKELY AREAS OF CONTAMINATION AND SOIL SAMPLES).

a) If further investigation alternative is selected:

YES Site inspection - anticipated inspection date FALL '86 OR SPRING '87 ?

State or Federal inspection BOTH (HSWA JURISDICTION)

YES Preliminary Assessment - anticipated completion date SUMMER 1986 ?

UNKNOWN RI/FS - anticipated date of initiation _____

State/Federal_____

Private Party_____ identify party(ies)

_____

b) If Permit Alternative is Selected: Projected Schedule

Date of Part B Submission: _____

Date of Completeness Check: _____

Date for Additional Submissions (if required): _____

Date of Completion of Technical Review: _____

Completion of Draft Permit/Permit Denial: _____

Public Notice for Permit Decision: _____

Date of Hearing (if appropriate): _____

Date for Final Permit or Denial Issuance: _____

Description of any corrective action provisions to be included in permit -

_____

_____

_____

c) If Corrective Action Order Alternative is Selected:

Estimated Date for Order Issuance: _____

Description of Provisions of the Order to be Completed by Facility: _____

_____

_____

Description of Compliance Schedule to be Contained in Order:

_____

_____

_____

d) If Other Administrative Enforcement Action is Selected:

Projected Date for Issuance of the Order: _____

Description of Provisions or Goals of the Order: _____

_____

_____

e) If Judicial Enforcement Alternative Selected:

Date of Referral to Office of Regional Counsel:_____

f) If Referral to CERCLA for Action Selected:

Date of Referral to CERCLA Sections:_____

g) If Voluntary/Negotiated Action Alternative if Selected:

Date of Initial Contact with Facility:_____

Description of Goals of Contact or Discussions with Facility: _____

_____

_____

_____

Date for Termination of Discussions if Not Successful:

_____

Date of Finalization of Settlement if Negotiation Successful:

_____

h) If State Action Alternative is Selected:

Date for Referral to State:_____

Name of State Contact:_____

Phone: _____

APPENDIX

The questions constituting this Appendix to the Facility Management Plan must be filled out prior to completion of recommendation elements of the Plan. The purpose of this appendix is to provide a summary documentation of the State and/or U.S.EPA review of available information on the subject facility. The intent is that a comprehensive file review will be conducted as the basis for selection of the recommended approach to a given facility. If the Appendix is completed by State personnel questions referring to available data reference information in State files; for Federal personnel the reference is to Federal files. Where questions refer to "all" available data or information and such material is voluminous, the response should indicate that files are voluminous, and then reference most telling information, for example groundwater contaminants found frequently or at extremely high concentrations should be specifically listed, and information most directly supporting recommended approach to facility should be described. If no information is available in facility files, the response should so indicate. It is also anticipated that this Appendix may be updated periodically as more information becomes available.

1. Description of All Available Monitoring Data for Facility:

Type of Data	Date	Author	Summary of Results or Conclusions
NO MONITORING HAS BEEN DONE.			
NO GROUNDWATER DATA.			
NO SOIL SAMPLE DATA.			
NO RUN-OFF DATA.			

2. Description of Enforcement Status:

Type of Action	Date	Local, State or Federal	Result or Status
(NOTICE OF VIOLATION)	OCTOBER 28, 1983	(WDNR HAZ. WASTE)	MOST ITEMS CORRECTED BY DECEMBER 30, 1983: EXCEPT THE CONTINGENCY AND WASTE ANALYSIS PLANS
(NOTICE OF VIOLATION)	MARCH 27, 1985	(WDNR HAZ. WASTE)	ADEQUATE EXPLANATIONS WERE PROVIDED FOR THE TANK REMOVAL AND K062 DISCHARGE (AND REMEDIATION).

6. Do inspection reports indicate observations of discolored soils or dead vegetation that might be caused by a spill, discharge or disposal of hazardous wastes or constituents?

X Yes - indicate date of report and describe observations

9/29/83 INSPECTION. "SOME WASTE RUN-OFF HAS OCCURRED ... DISCOLORATION OF THE (SOIL) SURFACE ... CONTAMINANTS ARE COMING FROM LEAKAGE OF EMPTY BARRELS"

_____ No

_____ Don't know

7. Do inspection reports indicate the presence of any tanks at the facility which are located below grade and could possibly leak without being noticed by visual observation?

_____ Yes - date of inspection and describe information in report

X No

_____ Don't know

8. Does a groundwater monitoring system exist at the facility? NO

9. If answer to question 8 is yes, is the groundwater system capable of monitoring both regulated RCRA units and other Solid Waste Management Units? N/A

Explain - NOT APPLICABLE

10. Is the groundwater monitoring system in compliance with applicable RCRA groundwater monitoring standards? N/A

If no, explain deficiency NOT APPLICABLE

3. Description of Any Complaints from Public:

Source of Complaint	Date	Recipient	Subject and Response
No Complaints on File.			

4. Description of All Inspection Reports for Facility:

Date of Inspection	Inspector (Local, State, Federal)	Conclusions or Comments
June 17, 1982	(WDNR Haz. Waste)	Many NR181 deficiencies
September 29, 1983	(WDNR H.W.)	Notice of Violation issued 10/83. Inspector noticed discolored soil and surface water run-off.

5. During inspection of this facility did the inspector note any evidence of past disposal practices not currently regulated under RCRA such as piles of waste or rubbish, injection wells, ponds or surface impoundments that might contain waste or active or inactive landfills?

_____ Yes - give date if inspection and describe observation

_____

_____

_____

X No

_____ Don't know

15. If answer to question 14 is yes, briefly describe conclusions of the PA/SI focusing on types of environmental contamination found, wastes and sources of contamination.

NOT APPLICABLE

16. If available, having reviewed the CERCLA notification, RCRA Part A and RCRA Part B, it appears that: (CERCLA unit refers to unit or area of concern in CERCLA response activity)

_____ RCRA and CERCLA units are same at this facility

_____ RCRA and CERCLA units are clearly different units

_____ There is an overlap between the RCRA and CERCLA units (some are the same, some are different)

X NO CERCLA UNITS EXIST; CERCLA ACTIVITIES DO NOT EXIST.

17. Description of Any Past Releases or Environmental Contamination:

Type/Source of Release	Date	Material Released	Quantity	Response
LEAKY BARRELS CAUSED RUN-OFF PROBLEM	9/29/83	(UNKNOWN)	(UNKNOWN)	CLEAN-UP OF UNKNOWN EXTENT.
RUPTURED TANK	MARCH 1985	(PHOSPHORIC ACID) K062	(UNKNOWN)	UNKNOWN RESPONSE BUT NDNR GAVE THEIR APPROVAL. (MUST BE IN DISTRICT FILES)

[RESULTED IN A NOTICE OF VIOLATION DATED 3/27/85 — SEE ENFORCEMENT QUESTION #2]

11. Decribe all information on facility subsurface geology or hydrogeology available.

Type of Information	Author	Date	Summary of Conclusions
NO GEOLOGY / HYDROGEOLOGY DATA AVAILABLE. FACILITY IS LOCATED ABOUT 1,000 FEET FROM THE MILWAUKEE RIVER (NEAR THE MOUTH INTO LAKE MICHIGAN).			

12. Did the facility submit a 103(c) notification pursuant to CERCLA?

____ Yes Date of Notification _____

_X_ No

13. If answer to 12 is yes, briefly summarize content of that notification. (waste management units identified, type of waste concerned)

NOT APPLICABLE

14. Has a CERCLA Preliminary Assessment/Site Investigation (PA/SI) been completed for this facility?

____ Yes

_X_ No

18. Identification of Reports or Documentation Concerning Each Release Described in Item 17.

Title/Type of Report	Date	Author	Recipients	Contents
INSPECTION REPORT MEMO	9/29/83	WDNR HAZ. WASTE MR. VIC PAPPAS	HAZ. WASTE FILE	INSPECTION REPORT NOTES
HAZ. WASTE NOTICE OF VIOLATION	NOV DATED 3/27/85	WDNR HAZ WASTE DEB ROSZAK	HYDRITE, HW BUREAU, ENFORCEMENT FILE, OTHERS	UNAUTHORIZED TANK REMOVAL, WASTE RELEASE, POTENTIAL FINE

19. Highlight any information gaps in the file - describe any plans to obtain additional needed information.

A FILE SEARCH FOR ADDITIONAL SPILL INCIDENTS HAS BEEN CONDUCTED, BUT FOUND NO MORE INCIDENTS REPORTED.

SOIL SAMPLES SHOULD BE TAKEN IN AREAS WHERE TANK OVERFILLING, POOR WASTE HANDLING PROCEDURES, TRANSFER SPILLAGE, HOSE LEAKAGE, UNCONTROLLED RUN-OFF, AND OTHER TYPES OF RELEASE MAY HAVE OCCURRED.

20. Summary of major environmental problems noted, desired solution and possible approaches.

Problem	Solution	Approach	Pros and Cons

NO KNOWN ENVIRONMENTAL PROBLEMS FROM THE TWO KNOWN RELEASES OF HAZARDOUS WASTES. HOWEVER, THE DEPARTMENT BELIEVES THAT THERE IS A STRONG PROBABILITY THAT ADDITIONAL, UNDOCUMENTED RELEASES HAVE OCCURRED AT THIS SITE.

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

October 28, 1987

IN REPLY REFER TO: 4430

Mr. Charles Clark, Manager Regulatory Affairs
Hydrite Chemical Company
P.O. Box 13188
Milwaukee, WI 53226

SUBJECT: Hydrite Chemical Co.
Oregon Street, Milwaukee
WID006435887

Dear Mr. Clark:

We reviewed the results of the Soil Sampling Results by Hydro-Search, Inc. dated September 14, 1987 and its recommendations for removal of contaminated soils. The report adequately addressed all pertinent issues of the closure plan approval dated May 14, 1987 and we tentatively agree with Hydro-Search's recommendations. Please proceed with the remedial action activities to remove contaminated soils at the Oregon Street facility. After completion of these activities, we need a report documenting these clean-up activities. The report is due 60 days after completion and should include photographs, drawings (including depths), sample results, and a narrative.

We are recommending to U.S. EPA that the site facility be considered "not environmentally significant" in regards to the HSWA corrective action process. We are transmitting a copy of our recommendation to EPA for their concurrence. When we receive a reply from EPA, we will notify you.

Please call Don Scheele at (608) 266-5425, or Pat Brady at (414) 562-9650 if you have any questions.

Sincerely,

Brenda Hagman

Brenda Hagman, Acting Section Chief
Hazardous Waste Management Section
Bureau of Solid and Hazardous Waste Management

BH:DS:mf/9200W
Enclosure

cc: B. Zellmer - SW/3
E. Lynch - SW/3
P. Brady - SED
C. Slaustas - EPA Region V, 5HS/13
D. Fraser - Hydro-Search, Inc.

COPY 2

AMENDMENT TO THE RCRA
FACILITY ASSESSMENT (RFA)
HYDRITE CHEMICAL CO. - OREGON STREET
WID006435887

The FMP and initial RFA for Hydrite Chemical Company, Oregon Street facility indicated the facility is environmentally significant. Since then a soil sampling investigation has been performed. A small amount of VOC contaminated soils near SWMU's were found on-site. The report recommended removal of all soils containing 10 parts per million (ppm) or more of VOC's. A photo ionization detector will be used to determine the extent of contamination and the soils removed will be disposed of in an approved RCRA disposal facility. A composite sample of unimpacted soils will be taken to verify no further contamination. After the clean-up, Hydrite Chemical will report these activities.

The soil sampling report indicated two areas at the site where correction action is required. One is a diked-in area near tanks 3 and 4 formerly used for waste solvent storage. Leaking valves and fittings are suspected as the likely source of this release. Another is a secondary containment area that contained waste solvent storage tanks for an incineration facility. This area has low levels of VOC's. Soils in these areas will be removed.

All other areas had no detection of VOC's, except for building #34, which had very low levels near background concentrations and therefore not significant enough to warrant corrective action.

These proposed clean-up activities should provide the necessary corrective action requirements for this site. Therefore, a corrective action order should not be necessary. WDNR will send EPA a copy of the soil excavation and sampling report when submitted by the facility. There are no known water supply wells in the area.

The Department concludes that the facility is not environmentally significant. An opinion by U.S. EPA is requested so that any recommendations can be implemented or that their concurrence can be directed to the facility.

9202W